



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

09/18/2026

F/SER24:FH

Dr. Carrie Simmons, Executive Director
Gulf Fishery Management Council
4107 West Spruce Street, Suite 200
Tampa, Florida 33607

Dear Dr. Simmons:

NOAA Fisheries received a request from Sustainable Marine Solutions to obtain an exempted fishing permit (EFP). The EFP would be valid through December 31, 2030, commencing on the date the EFP is issued. The EFP would support cooperative research activities funded by the NOAA Restore Science Program under the FFO-2025 long-term trends initiative to verify, characterize, monitor, and model multi-species fish spawning aggregations (FSAs) in federal waters of the Gulf of America (Gulf). The EFP would exempt these research activities from federal regulations specific to the Gulf reef fish and coastal migratory pelagic species fisheries in federal waters of the Gulf at 50 CFR § 622 Subpart B and Subpart Q. Preliminary work being conducted in support of the project is currently recognized by a letter of acknowledgement. The project is summarized below.

This project will engage interested parties to bridge the science-to-policy gap via advisory groups and an inclusive process to identify priority FSAs for characterization, monitoring, and modeling. The project aims to conduct cooperative research with fishermen, up to 120 sampling trips over four years (~ 30 trips per year), to be conducted by trained professional captains, without scientists on board. An initial set of sites was identified during a RESTORE-funded workshop and additional sites will be identified during meetings with small groups of fishermen during 2026 and 2027 and opportunistically through the life of project using information from a large monitoring database, bathymetric data, and geomorphological and seasonal cues from published and grey literature reports, as well as fishermen's knowledge. The applicant will prioritize those potential FSA sites for verification sampling using criteria developed in collaboration with scientists, managers, and fishermen.

FSAs can be verified using direct evidence (e.g., observed gamete release or gonad dissection) and supported by indirect evidence (e.g., courtship coloration and behavior). The EFP would allow trained professional captains to attempt to verify FSAs. Fishermen would conduct limited sampling to verify predicted spawning aggregations largely following protocols outlined in Heyman et al. (2017). To ensure data quality, accountability, and project management, captains will undergo training and certification to participate as members of a Study Fleet.

Study fleet members will operate federally-permitted commercial or recreational for-hire fishing vessels. Captains will be required to complete requisite training. After completing all training requirements, captains will receive a certificate signed by RESTORE project partners documenting they are a certified member of the Study Fleet and authorizing them to begin



collecting samples. Participants will be compensated through pre-agreed arrangements.

Sampling trips will be authorized for pre-agreed and limited numbers of pre-determined species, at highly specific, pre-agreed times and locations. Potential study sites include the entire Gulf, in depths from 10 to 1,800 ft and sampling may occur at any time of the year. Prior to each sampling trip, fishermen will complete a Pre-trip Agreement Form with RESTORE scientists and be provided with all necessary equipment for sample and data collection. At specified times and locations, fishermen will use hook-and-line gear (automatic reel, bandit gear, bottom longline, and rod and reel) to capture targeted species. When captured, each sampled fish will be marked with an identifying tag and photographed to mark time and location of sampling. These samples will be immediately immersed in an ice bath for rapid cooling and euthanasia and then stored on ice. Samples will be returned to the dock as soon as practicable, but no more than 48 hours post capture to ensure sample quality. Fishermen will coordinate their return with RESTORE project partners, who will serve as dockside samplers. Samplers, pre-trained and certified for data collection in this project, will meet Study Fleet participants upon their arrival. Study Fleet collected samples and associated data sheets, will be transferred to project scientists and recorded with chain of custody signatures to ensure all samples are accounted for, sample numbers do not exceed agreed-upon numbers or species, and serve as documentation to support fishers' remuneration.

Project scientists will append the field data sheet to include measurements recorded at dockside. These will include time and location of capture, species, sex, and morphometrics [TL, FL, and SL (mm) and weight (0.001 kg)] as well as photographs of the entire fish with gonads extracted and close-up photographs of gonads only. Otoliths will be removed for aging and gonad samples will be collected for histology to determine sex and reproductive status as in Brown-Peterson et al. (2011). Aging and histological analysis will be conducted under contract with MARMAP.

For your review, please find enclosed a copy of the application. Information pertaining to the EFP can also be found at: <https://www.fisheries.noaa.gov/southeast/sustainable-fisheries/cooperative-research-and-management-fish-spawning-aggregations-gulf>. If you need additional information, please contact Frank Helies at (727) 824-5305.

Sincerely,

AMENDOLA.KIMBE Digitally signed by
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for

Andrew J. Strelcheck
Regional Administrator

Enclosure



Sustainable Marine Solutions, LLC
14166 I and GN Road
College Station, TX 77845

Original submission: 7 April 2026
Revised submission: 29 July 2026

Andrew J. Strelcheck, Regional Administrator
NOAA Fisheries Service
Southeast Regional Office
Sustainable Fisheries Division
263 13th Ave. South
St. Petersburg, FL 33701

ATTN: Mr. Frank Helies,

Dear Mr. Strelcheck and Mr. Helies,

This letter includes a request for Exempted Fishing Permit (EFP) to conduct scientific research in the U.S. Gulf of America based on the definitions and guidance at 50 C.F.R. [§ 600.745\(b\)](#). This application supports the project, *Cooperative Research and Management for Fish Spawning Aggregations in the Gulf of America*, funded from October 2025 - September 2030 by the NOAA RESTORE Science Program. This request was originally submitted on April 7, 2026 and has been revised based on comments received from Mr. Helies and Mr. Adam Bailey on July 29, 2026. We would be grateful to receive authorization for two years, starting as soon as possible.

Please note that this project has already received Letter of Authorization (F/SER24:FH) on 4/28/2026 for five years, to cover other components of the study.

Please let us know if you have further questions.

Kind regards,

A handwritten signature in black ink that reads "William D. Heyman".

William Heyman, CEO

Exempted Fishing Permit Application

1. Date Submitted

- Original submission: 7 April 2026
- Revised submission: 29 July 2026

2. Project Coordinators

William Heyman
Sustainable Marine Solutions
wheyman@sustainable-marinesolutions.com
301-335-3230

Rebecca Asch
East Carolina University
aschr16@ecu.edu

3. Point of Contact

William Heyman
wheyman@sustainable-marinesolutions.com
301-335-3230

4. Statement of Purpose

This Exempted Fishing Permit (EFP) request supports activities proposed in the **Cooperative Research and Management for Fish Spawning Aggregations in the Gulf of America**, Restore Science Program FFO-2025: Long-Term Trends in the Gulf Ecosystem. The grant funding period is October 2025-September 2030. The purpose of the research is to verify, characterize, monitor, and model multi-species fish spawning aggregations (FSAs) in federal waters of the Gulf of America (GOA) and evaluate how long-term habitat suitability for FSAs is impacted by climate change. This project engages interested parties to bridge the science-to-policy gap via advisory groups and an inclusive process to identify priority FSAs for characterization, monitoring, and modeling. The project aims to conduct cooperative research with fishermen, both via this EFP, and through a Letter of Authorization (F/SER24:FH; 4/28/2026). This EFP is designed to cover up to 120 sampling trips over four years (~ 30 trips per year), to be conducted by trained professional captains, without scientists onboard.

Evidence for spawning can be provided by direct observation of gamete release or by documenting hydrated oocytes or post-ovulatory follicles in gonads of female fish within the 40-hour window surrounding the sample (Brown-Peterson et al., 2011). FSAs can be verified using direct evidence and supported by indirect evidence (e.g., courtship coloration and behavior). Here we request an Exempted Fishing Permit (EFP) for trained professional captains to attempt to verify FSAs.

Fishermen have discovered most known FSAs worldwide which has sometimes led to management. Typically, that process proceeds when fishermen share this information with scientists, who work collaboratively with them to characterize, verify, monitor and ultimately manage such sites (Pittman and Heyman, 2020).

Starting in the early stages of this project and continuing throughout, our team meets with experienced professional fishermen who provide anecdotal information on the timing and location of potential multi-species spawning aggregation sites. An initial set of sites was gathered during a RESTORE-funded workshop in Galveston, TX. Additional sites will be gathered during meetings with small groups of fishermen in Texas and Louisiana during 2026, at another workshop in Florida in 2027 and opportunistically through the life of project. These predicted times and locations are stored in private database accessible only to a small subgroup of project scientists.

Using prioritization criteria developed with scientists, managers and fishermen we will predict and prioritize potential FSA sites for verification sampling. These predictions will be supported from a large monitoring database, bathymetric data, and geomorphological and seasonal cues from published and grey literature reports (e.g., Helies et al., 2016; Heyman et al., 2019; Grüss et al., 2019) and knowledge of fishermen. Fishermen will conduct limited sampling to verify predicted spawning aggregations largely following protocols in Heyman et al. (2017). To ensure data quality, accountability, and project management captains will undergo training and certification to participate as members of a Study Fleet. Study fleet participants will only sample based on prior agreement with project scientists. Sampling trips will be authorized for pre-determined species, pre-agreed and limited numbers at highly specific, pre-agreed times and locations. Potential study sites include the entire Gulf, in depths from 10 to 1,800 ft and may occur at any time of the year.

Study Fleet Participation: Study fleet members will operate federally permitted commercial or recreational-for-hire fishing vessels. Captains will be required to complete requisite training. After completing all training requirements, captains will receive a certificate signed by RESTORE project partners proving they are a certified member of the Study Fleet and can begin collecting samples. RESTORE Study Fleet participants must be included on and carry a copy of the requested EFP. Certified Study Fleet captains will be provided with a Study Fleet Handbook that includes sampling procedures, best practices, data sheets, a descending device, and a copy of the EFP. Captains will sign Participation Agreements with RESTORE scientists, certifying that they will adhere to appropriate sampling procedures and conduct. Participants will be compensated through pre-agreed arrangements.

Sampling procedures: Prior to each sampling trip, fishermen will complete a Pre-trip Agreement Form with RESTORE scientists and be provided with all necessary equipment for sample and data collection. At specified times and locations, fishermen will use hook-and-line gear (automatic reel, bandit gear, bottom longline, and rod and reel) to capture targeted species. When captured, each sampled fish will be marked with an identifying tag and photographed to mark time and location of sampling. These

samples will be immediately immersed in an ice bath for rapid cooling and euthanasia and then stored on ice. Samples will be returned to the dock as soon as practicable, but no more than 48 hours post capture to ensure sample quality. Fishermen will coordinate their return with RESTORE project partners, who will serve as dockside samplers.

Samplers, pre-trained and certified for data collection in this project, will meet Study Fleet participants upon their arrival. Study Fleet collected samples and associated data sheets, will be transferred to project scientists and recorded with chain of custody signatures to ensure all samples are accounted for, sample numbers do not exceed agreed-upon numbers or species, and serve as documentation to support fishers' remuneration.

Project scientists will append the field data sheet to include measurements recorded at dockside. These will include time and location of capture, species, sex, and morphometrics [TL, FL, and SL (mm) and weight (0.001 kg)] as well as photographs of the entire fish with gonads extracted and close-up photographs of gonads only. Otoliths will be removed for aging and gonad samples will be collected for histology to determine sex and reproductive status as in Brown-Peterson et al. (2011). Aging and histological analysis will be conducted under contract with MARMAP.

Literature Cited

- Brown-Peterson, N. J., Wyanski, D. M., Saborido-Rey, F., Macewicz, B. J. and S.K. Lowerre- Barbieri. (2011). A Standardized Terminology for Describing Reproductive Development in Fishes. *Marine and Coastal Fisheries* 3(1): 52-70.
- Heyman, W.D., Erisman, B., Kobara, S., Farmer, N.A., Biggs, C., McCain, K., Lowerre-Barbieri, S., Karnauskas, M., Brenner, J. and S. Fulton. (2017). Cooperative Research and Monitoring Protocols for Fish Spawning Aggregations in the Wider Gulf of Mexico. LGL Ecological Research Associates, Inc. Bryan, TX. 37 p.
- Heyman, W.D., Grüss, A., Biggs, C., Kobara, S., Farmer, N., Karnauskas, M., Lowerre- Barbieri, S. and B. Erisman. (2019). Cooperative monitoring, assessment, and management of fish spawning aggregations and associated fisheries in the U.S. Gulf of Mexico. *Marine Policy* 106: 103689.
- Grüss, A., Biggs, C.R., Heyman, W.D. and B. Erisman. (2019). Protecting juveniles, spawners or both: a practical statistical modelling approach for the design of marine protected areas. *Journal of Applied Ecology* 56: 2328–2339
- Pittman, S. J. and W.D. Heyman. (2020). Life below water: Fish spawning aggregations as bright spots for a sustainable ocean. *Conservation Letters* 13(5): 1–7.

6. Targeted species for EFP

a. Species

Commercially and recreationally important species that are known to aggregate to spawn are targeted for sampling as summarized in Table 1.

b. Number/weight of species to be harvested anticipated to occur during exempted fishing

Each sampling trip will be uniquely targeting multi-species spawning aggregations simply to verify their existence in space and time. A single female fish, in spawning condition, is considered direct evidence of spawning in that time and location. Therefore, the number of samples to be collected at each predicted time and location will be minimal, (2-5) particularly for large-bodied and slower growing species (Table 1). Also note that since fish are not spawning at the same times and locations, trips will target only a small number of species. Therefore, we request permission for a total of only 233 fishes each year for two years.

Table 1: Requested numbers of samples by species

Family	Common Name	Scientific Name	Total
Balistidae (Triggerfish)	Grey Triggerfish	<i>Balistes capriscus</i>	15
	Almaco Jack	<i>Seriola rivoliana</i>	9
Carangidae (Jacks)	Greater Amberjack	<i>Seriola dumerili</i>	9
	Black Grouper	<i>Mycteroperca bonaci</i>	4
	Gag	<i>Mycteroperca microlepis</i>	12
	Mottled Grouper	<i>Dermatolepis inermis</i>	3
	Red Grouper	<i>Epinephelus morio</i>	5
Epinephelidae (Groupers)	Scamp	<i>Mycteroperca phenax</i>	10
	Snowy Grouper	<i>Hyporthodus niveatus</i>	15
	Warsaw Grouper	<i>Hyporthodus nigritus</i>	6
	Yellowedge Grouper	<i>Hyporthodus flavolimbatus</i>	6
	Yellowfin Grouper	<i>Mycteroperca venenosa</i>	3
	Yellowmouth Grouper	<i>Mycteroperca interstitialis</i>	6
Labridae (Tilefish)	Golden Tilefish	<i>Lopholatilus chamaeleonticeps</i>	15
	King Mackerel	<i>Scomberomorus cavalla</i>	9
Scombridae (Mackerels)	Spanish Mackerel	<i>Scomberomorus maculatus</i>	20
	Wahoo	<i>Acanthocybium solandri</i>	6
Rachycentridae (Cobia)	Cobia	<i>Rachycentron canadum</i>	4
	Cubera Snapper	<i>Lutjanus cyanopterus</i>	6
	Gray Snapper	<i>Lutjanus griseus</i>	20
Lutjanidae (Snappers)	Lane Snapper	<i>Lutjanus synagris</i>	20
	Red Snapper	<i>Lutjanus campechanus</i>	15
	Vermilion Snapper	<i>Romboplites aurorubens</i>	15

c. Expected disposition of all regulated species harvested under EFP

The project targets only mature fishes that are potentially spawning. Fishes meeting sampling criteria herein will be tagged and chilled on ice as indicated above, and appropriate data will be

collected. They will be delivered to receiving scientists, immediately after landing, at pre-arranged time and landing locations for morphometric measurements, gonad sampling, and otolith extraction.

Fishes caught during sampling that are either non-target species, or undersized will be noted on the data sheet and released with a descending device if possible. Study fleet participants will be allowed to retain non-target fishes caught during sampling if their capture is within legal limits of size, season, species for that vessel at that time. All other fishes will be donated to charity. Fishermen will be responsible for donations and will provide RESTORE scientists with disposition details including receiving entity, total poundage donated, and list of species.

d. *Anticipated impacts on fisheries, mammals, endangered species, or essential fish habitat. (NA)*

7. Anticipated gear for each vessel

a. *For fixed Gear*

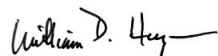
Directed sampling using hook-and-line gear will occur for <4 hours per trip/location.

b. *For mobile gear (NA)*

8. Information for vessels to be used for the EFP

Vessel Name	Vessel Owner	USCG / State Vessel Number	Home Port	Captain	email	phone
F/V Off the Rocks	Brad Nowicki	FL 7137RG	Key West, FL	Brad Nowicki	captbradnoweicki@gmail.com	(305) 481 7908
Alice Mae	Billy Wright, Jr.	655144	Galveston, TX	Billy Wright, Jr.	Billywright05@hotmail.com	(409) 789-3711
F/V Catch Share	Scott Hickman	TX 9948 BZ	Galveston, TX	Scott Hickman	Listodos@gmail.com	(713) 899-7389
Brand-X	Billy Wright	1048001	Galveston, TX	Billy Wright	Billywright05@hotmail.com	(409) 771-2299
B&B Sportfishing LLC	Taylor Borel	TX 1408 KH	Galveston, TX	Taylor Borel	Tborel91@icloud.com	(409) 313-0605
Hull Raiser	Buddy Guindon	686464	Galveston, TX	Buddy Guindon	katies.seafood@sbcglobal.net	(409) 771-1447
Last Sight	Randy Sobieraj	918890	Larose, LA	Randy Sobieraj	randysobieraj@yahoo.com	(407) 808-0403
Pure Adrenalin	Jamie Gaspard	LA2462-FR	Port Fouchon, LA	Jamie Gaspard	Pafcharters@yahoo.com	(225) 572-5788

9. Signature of applicant



William Heyman