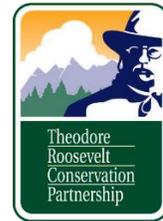




National Marine Manufacturers Association



July 28, 2022

Mr. Andy Strelcheck
Regional Administrator
NOAA Fisheries Southeast Regional Office
263 13th Avenue South
St. Petersburg, FL 33701

Dear Mr. Strelcheck:

We are writing to express our concerns on several fronts with the current direction of recreational red snapper management in the Gulf of Mexico. Specifically, we are disappointed with the lack of progress by the Gulf MRIP Transition Team in understanding the differences between MRIP and state data collection programs, the apparent inability of the state programs to be used in the ongoing red snapper research track assessment, and in calibrating the state data to an MRIP currency without first having the basic understanding of the vast discrepancies caused by MRIP. As such, we urge NOAA Fisheries to refrain from requiring any calibration until those differences are understood and a more appropriate calibration methodology is developed, if necessary, while also moving forward with any new harvest level increases across sectors. We recommend you embrace the independent peer reviewed Great Red Snapper Count (GRSC)¹ as an opportunity to validate the fact the recreational sector is not overfishing and allow for additional time for development of more appropriate calibration methodology.

The Consolidated Appropriations Act of 2021 (H.R. 133) provided direction to NOAA Fisheries to, “address the question of which data collection system (i.e., MRIP or the catch data programs administered by the Gulf States) are providing the best estimates of recreational red snapper catch in the Gulf of Mexico,” before any related regulatory changes have been made. NOAA Fisheries was further directed to contract with an independent consultant to provide the following:

“(1) an independent assessment of the accuracy and precision of both the Federal and State recreational catch data programs in the Gulf of Mexico;

(2) recommended improvements to be made to the Federal and State recreational catch data programs in the Gulf of Mexico to improve accuracy and precision; and

(3) an independent assessment, based on the results of the two prior items, of how best to calibrate the Federal and State recreational catch data programs in the Gulf of Mexico to a common currency.”

Unfortunately, little progress has been made by the Transition Team on any of the points above, other than a cursory proposal for a 3–5-year research plan at their February 2022 meeting to address these fundamental and critical questions. The 2022 Gulf red snapper season is the 5th year where the states have been delegated management of the private recreational sector yet understanding the differences in landings estimates between MRIP and the various state data collection programs has apparently not been a NOAA Fisheries priority. In the absence of the Congressionally directed understanding of the inherent problems with MRIP as it relates to the state programs, the simple ratio calibration proposed for 2023 will unnecessarily result in significant negative economic and social impacts to the states, especially Alabama and Mississippi. We urge NOAA Fisheries to expedite the work of independent consultants to determine the sources of the errors in MRIP, not just the state programs, that are resulting in significant discrepancies before moving forward with any calibration methodology.

While some claim that delaying calibration results in the private recreational sector overfishing and is in violation of the Magnuson-Stevens Act, when actual removals are compared to the absolute population abundance estimated by the GRSC, that does not seem possible at current fishing mortality rates during the state-managed seasons. The Modernizing Recreational Fisheries Management Act of 2018 clarified that NOAA Fisheries and the regional management councils can use alternative management measures, such as extraction rates and fishing mortality targets, to manage a fishery. Using an extraction rate and fishing mortality target requires a high degree of confidence in an estimate of absolute population abundance against which removals (in numbers of fish) can be applied to estimate a fishing mortality rate. The GRSC gives us an unprecedented opportunity to evaluate the number of fish we’re harvesting against a population abundance estimate for which we have a relatively high degree of confidence and compare that rate to the current management reference points. While rather simplistic, one potential way to do that is shown below:

- At the January 2022 meeting, the SSC approved using an absolute abundance estimate of 96,700,000 age 2+ red snapper in the Gulf of Mexicoⁱⁱ based on the GRSC fishery independent data collected in 2019. Using the GRSC length frequency histogram for all habitat types and all regionsⁱⁱⁱ, we can derive an estimate of 80% or 77,360,000 of the total age 2+ red snapper are age 4+ (the point at which red snapper are exploitable in the recreational fishery).
- Using the 2019 reported landings in pounds whole weight in MRIP - CHTS as published on NOAA’s website, the total weight landed by the five Gulf states equaled 5,366,247 pounds^{iv}. The average weight of recreationally landed red snapper from 2017-2019 was estimated to be 6.09 pounds^v. Dividing the total pounds reported by the average weight equals 881,157 fish landed by the private and state charter recreational anglers in 2019.

- The total reported landings for the federal charter/for-hire (CFH) sector in 2019 was 2,558,734 pounds^{vi}. Your office recently provided landings estimates in numbers of fish for the CFH sector in 2019, which was 337,997 fish total for the charter and head boat components combined (personal communication via email). Dividing the total pounds by the number of fish resulted in an average weight for red snapper landed in the CFH fishery of 7.57 pounds. If the CFH fleet were able to catch their entire quota of 3,129,777 pounds, that would equate to an additional 413,445 red snapper landed in the recreational sector.
- Summing the total number of red snapper landed by the private recreational/state charter component and the total *potential* harvest for the federal charter/for-hire component, we arrive at an estimate of 1,294,602 total red snapper landed (or potentially landed in the case of the CFH). Dividing that number by the 77.36 million age 4+ red snapper absolute abundance estimate approved by the Gulf Council SSC in January, we get an F rate of 0.0167. Even if we use 80% of the updated absolute abundance estimate of 85.6 million red snapper recently approved at the July SSC meeting as the denominator, we get an F rate of 0.0189.
- SEDAR 52 set an $F_{MFMT} = 0.058$ ^{vii} and an $F_{rebuild} = 0.052$ ^{viii}, both of which account for average discards in the recreational and commercial fisheries. Applying the allocation percentages (49% recreational) to the published fishing mortality threshold and the fishing mortality target for rebuilding results in an $F_{MFMT} = 0.028$ and $F_{rebuild} = 0.025$ for the recreational sector. Granted, we know these numbers will change, and likely increase, in the next stock assessment given the new FES numbers. However, in the very least, using these as reference points is the most conservative approach and are what current management is based upon.
- Even with using the MRIP-CHTS landings (in which we have little confidence are correct), and using the lowest estimated abundance derived from the GRSC, an F rate of 0.019 suggests the recreational sector is not “overfishing” by definition. Furthermore, it suggests we are fishing at a rate that is below the rate necessary to rebuild the stock.

Again, it is disappointing that we have the best opportunity we have ever had in a federally managed fishery to measure our harvest against a thoroughly vetted, peer-reviewed estimate of abundance to ensure that our current rate of extraction is appropriate to prevent overfishing and rebuild the stock as required by MSA, yet NOAA Fisheries has not seized upon that opportunity. The GRSC abundance estimate demonstrates the stock is much bigger than we thought, which means catch limits have likely been set lower than needed to continue rebuilding the stock. While a rather simplified approach to check the validity of the current ACL that we are managing to today, the calculations using the GRSC estimate of abundance above suggest the push to move forward with simple calibration ratios as soon as possible is unjustified because overfishing of red snapper by the recreational sector is likely not occurring.

The Magnuson-Stevens Fishery Conservation and Management Act requires NOAA Fisheries to manage for optimal yield while ensuring the long-term sustainability of our fisheries resources. In the case of red snapper in the Gulf of Mexico, the proposed simple ratio calibration of state data to an MRIP data series that results in significant, unresolved discrepancies in some states will needlessly sacrifice optimal yield

for the private recreational sector. Nothing is gained by using the proposed calibrations at this point in time.

For these reasons, we urge you to expedite the consultation process with the Gulf MRIP Transition Team to first determine the problems with the MRIP estimates when compared to the state data collection programs, which will lead to the development of a more adequate and appropriate calibration methodology, if necessary. At a minimum, the recreational fishing community expects this analysis and updated calibration approach over the currently proposed simple ratio calibration to be completed prior to the red snapper operational track assessment. Until that time, maintaining status quo with state management is not likely resulting in overfishing and should be allowed to continue without penalty.

Furthermore, NOAA and the Council should look at F rates and other alternative management approaches that can be used moving forward should we have the opportunity to incorporate more fishery-independent monitoring like the GRSC on a reoccurring basis. The GRSC provided a great opportunity to rethink how we assess and manage red snapper.

Thank you for your time and consideration of our comments.

Sincerely,

Martha Guyas
Southeast Fisheries Policy Director
American Sportfishing Association

Jeff Angers
President
Center for Sportfishing Policy

Ted Venker
National Conservation Director
Coastal Conservation Association

Chris Horton
Senior Director, Fisheries Policy
Congressional Sportsmen's Foundation

Clay Crabtree
Director, Federal Government Relations
National Marine Manufacturers Association

Chris Macaluso
Center for Marine Fisheries Director
Theodore Roosevelt Conservation Partnership

ⁱ [Great Red Snapper Count](#) - Estimating the Absolute Abundance of Age-2+ Red Snapper (*Lutjanus campechanus*) in the U.S. Gulf of Mexico. August 16, 2021.

ⁱⁱ [Standing, Reef Fish, Ecosystem, and Socioeconomic SSC Meeting Summary January 11 – 13, 2022](#), page 15.

ⁱⁱⁱ [Great Red Snapper Count](#) - Estimating the Absolute Abundance of Age-2+ Red Snapper (*Lutjanus campechanus*) in the U.S. Gulf of Mexico. August 16, 2021 – page 100; Figure 25.

^{iv} [Gulf of Mexico Red Snapper Private and State Charter Recreational Landings from State Survey Programs](#).

^v [Gulf of Mexico Red Snapper Recreational Data Calibration and Recreational Catch Limits](#) - 4.1.3 - Reference to 6.09 lbs average weight of a Gulf recreationally landed red snapper from 2017-2019, page 44.

^{vi} [Gulf of Mexico Red Snapper Landings](#) – slide 6.

^{vii} [Final SEDAR 52 Report](#) – F MFMT=0.058, Table 5.2, page 139.

^{viii} [SEDAR 52 Overfishing Limits and Acceptable Biological Catches for the Red Snapper Fishery in the Gulf of Mexico](#) – F rebuild=0.052, Table 3, page 11.