



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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October 3, 2023

Mr. Kevin Anson, Chair
Gulf of Mexico Fishery Management Council
4107 West Spruce Street, Suite 200
Tampa, Florida 33607

Dear Mr. Anson,

This letter pertains to a discussion that took place during the South Atlantic Fishery Management Council's (South Atlantic Council) September meeting regarding Snapper Grouper Amendment 44/Reef Fish Amendment 55 addressing management of Yellowtail Snapper.

The South Atlantic Council discussed how to move forward with developing the amendment considering the findings of the pilot study to evaluate potential sources of bias in the Marine Recreational Information Program's Fishing Effort Survey (MRIP-FES) questionnaire design. The discussion concluded with the following direction to staff:

Ask the South Atlantic SSC to consider withdrawing the Yellowtail Snapper stock's acceptable biological catch (ABC) and prioritize a new assessment for the stock in light of the MRIP-FES pilot study and Florida State Reef Fish Survey. Because this is a joint amendment, ask the Gulf Council to consider consulting the Gulf SSC to take the same action.

The South Atlantic Council's intent was to request that their Scientific and Statistical Committee (SSC) **reconsider** their ABC recommendation for the Yellowtail Snapper stock and to suggest that, because the stock is assessed as a single unit, the Gulf Council also consider making the same request of their SSC. Additionally, mention of Florida's State Reef Fish Survey (SRFS) above is a suggestion to explore whether the SRFS data could be used in a new stock assessment for Yellowtail Snapper instead of MRIP.

The South Atlantic Council cited the following as rationale for their request:

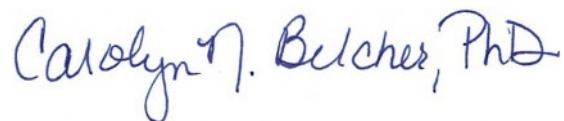
- The results of the pilot study constitute new information that has the potential to drastically affect the way the fishery is managed. Per National Standard 2 guidelines: *"...Between the initial drafting of an FMP and its submission for final review, new information often becomes available. This new information should be incorporated into the final FMP where practicable; but it is unnecessary to start the FMP process over again, unless the information indicates that drastic changes have occurred in the fishery"*

that might require revision of the management objectives or measures.” The South Atlantic Council is concerned that future adjustments to recreational estimates could significantly affect the jurisdictional allocation of the Yellowtail Snapper (ABC) between the two Councils as well as the sector allocation of the South Atlantic total annual catch limit.

- Hence, it is prudent to reconsider whether the current stock assessment is still consistent with Best Scientific Information Available.
- During the data workshop for Mutton Snapper (SEDAR 79) data from Florida’s State Reef Fish Survey (SRFS) were compared to MRIP data, and it was determined that a bias consistent with the pilot study’s findings was present in the recreational data for that species. Because Yellowtail Snapper is also a South Florida-centric species, it is reasonable to assume the same bias may be present in the recreational data for that species and due diligence is warranted.
- The Gulf’s Gag Grouper assessment (SEDAR 72) was re-run with SRFS data, and the South Atlantic Council is interested in exploring a similar approach for Yellowtail Snapper.
- The current stock assessment for Yellowtail Snapper indicates the stock is not undergoing overfishing (nor is the stock overfished) and implementing a new ABC is not as pressing as it would be for a species subject to overexploitation.
- The South Atlantic SSC is scheduled to receive a presentation on the FES pilot study at their upcoming October meeting. As such, the SSC has not yet considered how the results of the pilot might affect other stock assessments.

We look forward to continuing to work with the Gulf Council to find the most efficient path forward to address management of Yellowtail Snapper. Please contact Allie Iberle (allie.iberle@safmc.net) if you would like additional information.

Sincerely,



Carolyn N. Belcher, Ph.D.
SAFMC Chair

LN: 202344

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