

Vermilion Snapper Commercial Trip Limit

Council Discussion Document

September 2021

Background

In 2020, NOAA Fisheries enacted a temporary rule for emergency action (85 FR 57982) that increased the commercial trip limit for vermilion snapper in the South Atlantic region from 1,000 pounds gutted weight (lb gw) to 1,500 lbs gw from September 17, 2020, through March 16, 2021. This change was made to address economic losses resulting from the COVID-19 pandemic such as declines in and disruptions to markets and for-hire trips, restricted access to ports, closures of harbors and boat ramps, and disruptions to obtaining fishing supplies.

Current management outside of the temporary rule for vermilion snapper includes a commercial split season with 50% of the commercial annual catch limit (ACL) allocated to January-June and 50% allocated to July-December. Unused ACL from the January-June season carries over to the July-December season. The commercial trip limit is 1,000 pounds gutted weight (gw) throughout both seasons.

The report in **Appendix 1** was provided in July 2020 as rationale for the South Atlantic Fishery Management Council's request for the temporary rule. This report predicted vermilion snapper commercial season lengths for 2020 and 2021 under two scenarios: a 1,500-pound gw trip limit in effect for 180 days and a 1,500-pound trip limit throughout 2021. These predictions were based on 2017-2019 catch rates. The scenario that occurred, a 1,500-pound gw trip limit in effect for 180 days, was predicted to lead to commercial closures in April for the January-June 2021 season and November for the July-December 2021 season.

Landings for vermilion snapper in 2020 were 825,955 pounds whole weight (lbs ww) and comprised 82.18% of the 2020 commercial annual catch limit (ACL) (1,005,040 lbs ww) (*Source: Southeast Fisheries Science Center, Quota Monitoring Program, 8/24/2021*).

Preliminary commercial landings as of August 24, 2021, are 322,228 lbs ww, which is 33.66% of the 2021 commercial ACL (957,440 lbs ww). Preliminary 2021 commercial landings from

January through June are 268,265 lbs ww, 56.0% of the portion of the commercial ACL allocated to this fishing season (478,720 lb ww). Preliminary 2021 commercial landings from July to date are 53,963 lbs ww, 11.3% of the portion of the commercial ACL allocated to this fishing season (478,720 lbs ww), not including unharvested ACL from January-June that is carried over to July-December.

Table 1 shows historical commercial landings and ACLs through 2020. No seasonal closures have occurred since 2017. Beginning in 2020, the commercial trip limit was no longer reduced when landings reached 75% of the seasonal quota, thus the trip limit is 1,000 lbs gw throughout the season (outside of the time the temporary rule was in effect).

Table 1. Commercial landings and annual catch limits for vermilion snapper from 2004-2020. *Source: Southeast Fisheries Science Center, Quota Monitoring Program, 8/24/21*

Vermilion Snapper											
Year	Fishing Year	Units	Seasonal Landings	Quota*	Quota %	Trip Limit Reduction	Closure Date	Total Landings	ACL	ACL %	Data Source
2020	Jan 1- Jun 30	ww	333,855	502,520	66.44			825,955	1,005,040	82.18	ACL_FILES_040521
	Jul 1- Dec 31		492,100	502,520	97.93						
2019	Jan 1- Jun 30		513,279	536,860	95.61	05/06/19		1,020,202	1,073,720	95.02	
	Jul 1- Dec 31		506,923	536,860	94.42	11/11/19					
2018	Jan 1- Jun 30		387,758	431,460	89.87	04/26/18		846,472	862,920	98.09	
	Jul 1- Dec 31		458,714	467,574	98.11	10/26/2018**					
2017	Jan 1- Jun 30		404,291	431,460	93.70	03/22/17	5/17/17	861,792	862,920	99.87	
	Jul 1- Dec 31		457,501	452,134	101.19	10/02/17	10/17/17				
2016	Jan 1- Jun 30		437,178	431,460	101.33	03/02/16	3/29/16	863,463	862,920	100.06	
	Jul 1- Dec 31		426,285	432,305	98.61	08/28/16	10/11/16; Re-opened 12/14/16-12/15/16				
2015	Jan 1- Jun 30		458,097	438,260	104.53	03/02/15	4/15/15	939,834	876,520	107.22	
	Jul 1- Dec 31		481,737	438,260	109.92	09/10/15	9/22/15				
2014	Jan 1- Jun 30	500,115	446,080	112.11	03/11/14	4/19/14	985,276	892,160	110.44		
	Jul 1- Dec 31	485,161	446,080	108.76	08/23/14	9/12/14					
2013	Jan 1- Jun 30	318,474	466,480	68.27		2/13/13	1,020,012	932,960	109.33		
	Jul 1- Dec 31	701,538	613,278	114.39	10/16/13	12/2/13					
2012	Jan 1- Jun 30	407,585	315,523	129.18		2/29/12	908,661	618,046	147.02		
	Jul 1- Dec 31	501,076	302,523	165.63		9/28/12					
2011	Jan 1- Jun 30	332,895	315,523	105.51		3/10/11; Re-opened 5/1/11-5/8/11	926,901	618,046	149.97		
	Jul 1- Dec 31	594,006	302,523	196.35		9/30/11					
2010	Jan 1- Jun 30	356,823	315,523	113.09		3/9/10	876,891	618,046	141.88		
	Jul 1- Dec 31	520,068	302,523	171.91		10/6/10					
2009	Jan 1- Jun 30	421,831	315,523	133.69			827,996	618,046	133.97		
	Jul 1- Dec 31	406,166	302,523	134.26		9/18/09					
2008	January 1 - December 31						1,100,809	1,100,000	100.1		
2007							983,910	1,100,000	89.4		
2006							768,191	1,100,000	69.8		
2005							1,019,557	None			
2004							1,008,714	None			

* As stated in the federal regulations, any unused portions of the quota from the January 1 through June 30 season will be added to the July 1 to December 31 quota. The new quota is used to project trip limit reductions and closures.

**As of 11/27/2018, there were 36,114 lbs ww unused from the January 1 through June 30 season, and were added to the July 1 through December 31 quota of 431,460 lbs ww, for a total of 467,574 lbs ww.

Previous Advisory Panel Recommendations

At the March 2021 South Atlantic Fishery Management Council (Council) meeting, the Council's Snapper Grouper Committee requested input from the Snapper Grouper Advisory Panel (AP) on whether a long-term change to the vermilion snapper commercial trip limit should be considered. The AP met in April 2021 and provided the following comments:

- Distances traveled to fishing grounds can be 40-60 miles in some areas (e.g., off the Carolinas). A larger trip limit could make trips more efficient.
- Closures to red grouper and potential closures to red porgy and snowy grouper make vermilion snapper more important. The most critical time to have the season open is in May and June.
 - If the Council considers increasing the trip limit to 1,500 pounds, they should consider re-establishing the stepdown. Possibly consider a 1,000 pound limit at 50% of the seasonal quota and a 500 pound limit at 75% of the seasonal quota.
- The AP asked about information that would indicate how many boats benefitted from the increased trip limit.

In September 2021, the Council reviewed the AP's recommendations. However, the Council also received information on upcoming reductions in allowable harvest for other species including gag grouper and red snapper, which they felt may impact the AP's recommendations for vermilion snapper. The Council requested that the AP respond to the following questions to review their previous recommendations in light of more recent information and help prioritize a commercial trip limit change with other actions being taken in the snapper grouper fishery:

1. Does the AP still recommend implementation of a stepdown in the commercial trip limit?
2. How high of a priority or how quickly should changes to vermilion snapper be considered?
3. What are the potential benefits, risks, and preferences of a longer season versus a higher trip limit to different demographics in the commercial fishery?

AP Action:

PROVIDE COMMENTS IN RESPONSE TO THE COUNCIL'S QUESTIONS ABOUT CONSIDERATION AND PRIORITIZATION OF CHANGES TO THE VERMILION SNAPPER COMMERCIAL TRIP LIMIT.

Appendix 1.

South Atlantic Vermilion Snapper

Vermilion Snapper Commercial Trip Limit Analysis
LAPP/DM Branch; July 13, 2020

The South Atlantic Fishery Management Council (SAFMC) manages vermilion snapper from federal waters at the Virginia/North Carolina border through the Atlantic side of the Florida Keys under the Snapper-Grouper Fishery Management Plan (FMP). In 2013, Amendment 18 to the Snapper-Grouper FMP modified the commercial trip limit by reducing it from 1,500 pounds gutted weight (lbs gw) to 1,000 lb gw per trip and further reduced the trip limit to 500 lb gw once 75% of the commercial annual catch limit (ACL) was landed. In 2019, Abbreviated Framework 2 to the FMP set the ACL through 2023 (**Table 2**). In 2020, Regulatory Amendment 27 to the Snapper-Grouper FMP removed the commercial trip limit reduction when 75% of the seasonal quota was met, but retained the 1,000 lb gw commercial trip limit for both fishing seasons. The commercial sector has had in-season ACL closures every year between 2009 and 2017. Because landings have been considerably lower in 2020 compared to previous years, the SAFMC is considering taking action through an emergency rule to increase the commercial trip limit for either 180 days beginning in September 2020 or through the 2021 calendar year. This analysis investigates when the commercial sector will be expected to close if an emergency rule action is taken.

Table 2. The current South Atlantic vermilion snapper ACLs [annual catch limits]. [The Total ACL is for both the recreational and commercial sectors in pounds whole weight (lbs ww). The commercial ACL is shown in lbs ww and pounds gutted weight (lbs gw). The commercial ACL is split between two seasons, with half allocated to January-June and half allocated to July-December. Any unused quota from the first season is carried forward to the second. Unused quota from the second season is not carried forward.]

	Total ACL (lbs ww)	Commercial ACL (lbs ww)	Commercial ACL (lbs gw)
2020	1,478,000	1,005,040	905,441
2021	1,408,000	957,440	862,559
2022	1,362,000	926,160	834,378
2023	1,336,000	908,480	818,450

Final commercial landings for 2007-2009 and 2015-2019 were provided from the Southeast Fisheries Science Center (SEFSC) on July 7, 2020, and preliminary 2020 commercial landings were provided on July 2, 2020. Because the commercial sector reached each split-season ACL every year between 2009 and 2017, the months of Mar-Jun and Sept-Dec were typically closed to vermilion snapper. To predict 2017 landings during months that were closed, a mean ratio was first developed that compares each month that is typically closed to a month that is typically open using years when the fishery was open. For this analysis, estimates of predicted landings are based on the mean ratios of Mar – Jun landings to February landings from 2007-2009, and on the mean ratios of Sept – Dec landings to July landings from 2006-2008. These years were used because they were the last three completely open fishing years for vermilion snapper stocks for

those months. The ratios estimated ranged between 106 and 222% of February landings for Mar–Jun, and between 86 and 122% of August landings for Sept - Dec. For example, the February to March mean ratio was 172% and applied to the 2017 mean landings in February, which were 93,3418 lb whole weight (ww) resulted in projected landings of 161,007 lbs ww for April. Landings in the Mar-Jun and Sept-Dec period are projected to be relatively high as this analytical approach does not account for the potential redistribution of peak effort to January and July following the ACL closures. Also, landings in 2006-2009 were higher as there was no commercial trip limits during that time. Thus, it is likely the projected landings presented in **Figure 1** are an upper bound for what might be caught.

This analysis accounts for the increase in landings that would result from the increased commercial trip limits being proposed. This expected increase was estimated by comparing the average 2017-2019 monthly South Atlantic vermilion snapper commercial logbook data with and without a 1,500 lb gw maximum trip limit by setting all trips that landed over 900 lb gw to 1,500 lb gw (**Table 3**). Trips above 900 lb gw were chosen because they were trips that were close to meeting the current trip limit. These expected changes in landings were then applied to both 2019 monthly landings, since these represent the most recent landings, and to the average 2017-2019 monthly landings in order to generate a range of expected split-season trip reduction and closure dates. Additionally, this analysis assumes that landings for the remainder of the 2020 fishing year will continue at the reduced rate that was seen at the beginning of the year, which was found to be 47.3% of 2019 landings. **If the commercial landings of vermilion snapper continue as expected, then the proposed commercial trip limit increases will result in no season closures in 2020, but may result in split-season closures in 2021 as described in Table 4.**

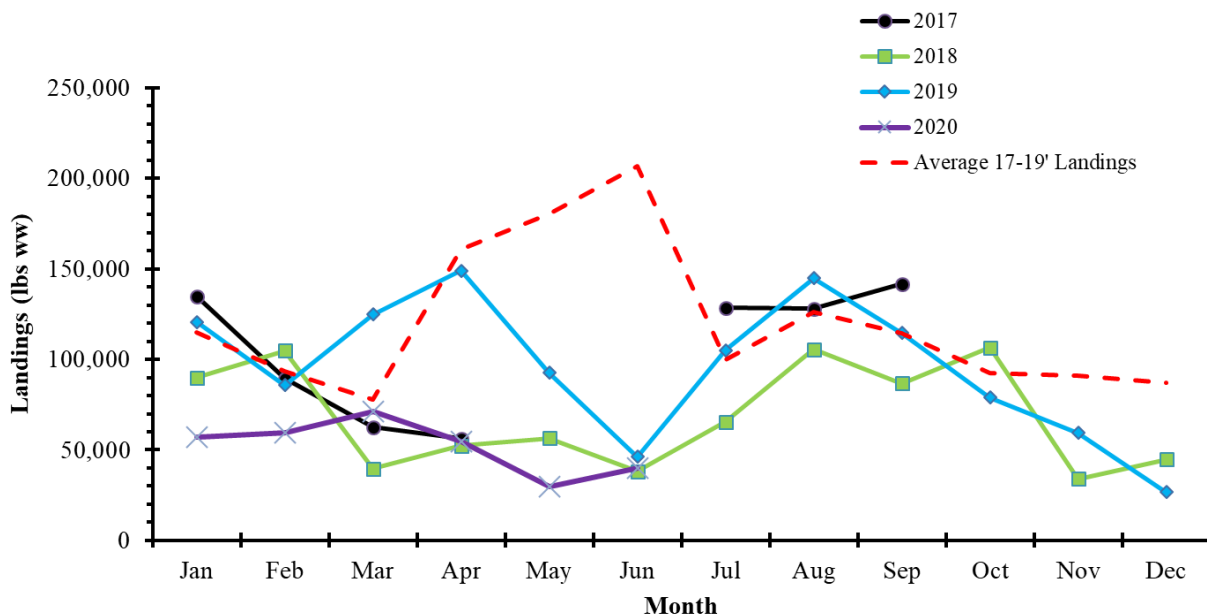


Figure 1. South Atlantic vermilion snapper monthly commercial landings (lb ww) for 2017-2019, and projected future landings. March through April landings and September through December landings were estimated using ratios that compare those months to February and August landings, respectively. Source: SEFSC Commercial ACL Dataset (July 7, 2020).

Table 3. Projected percent change in landings for the proposed 1,500 lb gw commercial trip limit based on South Atlantic vermilion snapper commercial logbook data. The two-month average percent change was applied to March through June landings, and the three-month average was applied to October through December landings.

Trip Limit (lb gw)	Jan	Feb	Two-Month Average	Jul	Aug	Sep	Three-Month Average
1,500	25.2%	25.6%	23.6%	19.0%	22.2%	24.6%	21.9%

Table 4. The projected split-season season closure dates for South Atlantic vermilion snapper for the 2020 and 2021 ACL with each proposed commercial trip limit. The total annual landings are included if no closure was projected. Otherwise, the projected closure date is provided for both the January through June and July through December seasons.

Action Alternatives	2020 (ACL: 1,005,040 lb ww)		2021 (ACL: 957,440 lb ww)	
	2017-2019 Avg Ratio	2019 Ratio	2017-2019 Avg Ratio	2019 Ratio
No Action	No closure (539,594 lb ww/486,121 lb gw)	No closure (571,655 lb ww/515,005 lb gw)	Jan - Jun: 6-May Jul - Dec: 16-Nov	Jan - Jun: 30-Apr Jul - Dec: 15-Nov
180 Day Increased Trip Limit	No closure (572,200 lb ww/515,495 lb gw)	No closure (604,186 lb ww/544,312 lb gw)	Jan - Jun: 26-Apr Jul - Dec: 16-Nov	Jan - Jun: 20-Apr Jul - Dec: 15-Nov
Increased Trip Limit Through 2021	No closure (572,200 lb ww/515,495 lb gw)	No closure (604,186 lb ww/544,312 lb gw)	Jan - Jun: 19-Apr Jul - Dec: 18-Oct	Jan - Jun: 11-Apr Jul - Dec: 11-Oct