

Subject: SFA comments on proposed SA states EFPs on state mgt of red snapper

All,

On behalf of the members of SFA I am providing comments on the proposed SA states EFPs re state mgt of recreational red snapper. I will not be in attendance but will be listening when I can.

SFA supports the concept of each SA state managing rec red snapper as the Gulf of America states do. However, we have serious concerns about the potential negative impacts to the commercial fishing sector as a result of the current proposals and lack of critical requirements that can adversely impact the future red snapper stock assessments. As all should be aware, the Gulf state management programs took several years to fully vet and to consider critical data collection that is necessary for Gulf wide stock assessments. Also, while each Gulf state has its own data collection system and collects and processes its own rec red snapper data, these data programs have gone thru a calibration process that allows the collected data to be used in a way that the data is able to be calculated in a similar fashion that provides the data to end up in fair comparison for use in the stock assessments. The proposals we have seen from the SA states do not have such a process and we see no effort in the EFPs to create such a process.

In addition, while each SA state appears to have some type of rec data collection program, with the Florida SRFS being the most complete but lacking in necessary data collection items, we do not see any effort to provide any calibration of each state data program. Such calibration of differing data collected is a critical component to provide to the science center for a valid stock assessment. Clearly, if each state had a stock assessment off its coast, then the unique state data system could be used but then you would also have to have a separate data system for the commercial fishery. In order for a SA wide stock assessment to be done the data and other relevant information must be provided representing the whole of the SA states, not individually.

The semi success of the Gulf states rec red snapper programs is due to the fact that the Gulf data is calculated on a Gulf wide basis as the red snapper is a Gulf stock, not a FL or TX stock. Any program in the SA must be done in a similar fashion in order to truly represent a SA stock of red snapper.

As all know, red snapper, or any species, is generally caught with releases and discards outside any fishing season. While the proposed EFPs provide for 39 days of fishing off FL, 60 days off GA and SC, and 100 anglers fishing whenever off NC, there are no provisions in these EFPs to collect fishing data outside those days. There is also no limit on how many red snapper will be harvested and discarded dead during the proposed seasons and

certainly no system to survey fishing effort and catch outside the proposed seasons. We see nothing in the proposals where rec anglers will be required to report when they fish and how long they fish, where such effort data is critical to determine total effort and catch. While we understand these EFPs are experiments, from our concern about the impact to the red snapper stock and the high possibility of extremely large removals which can be detrimental to the commercial allocation and resulting loss of quota and days fishing, we have serious issues.

If the red snapper fishery was simply a single use fishery only being prosecuted by the rec sector, we would not have any concerns. But, since this is a mixed-use fishery with economic and social impacts for all users, rec and com, we are concerned about these EFPs and the potential negative impacts to the commercial fishing fleet, the processors, markets, and eventually the consumer. Should the states provide more information about how the total effort and catch by the rec anglers will be collected and compared to one another, how the fishing effort and catch will be collected outside the proposed seasons, how the anglers will report when they fish, how long they fish, what they harvest, and most importantly what their discards are, then our concerns about any negative impact to the commercial sector may be reduced.

As I state above, we support the concept of state management of rec red snapper, but only if all the data is collected and processed in a way that the total SA stock can be monitored and assessed. As all know the commercial sector is in dire straits and we cannot support any program that could be detrimental to the commercial fishery, the fishers, and all who depend on the fishery for their livelihood.

I look forward to the council discussion and hopefully further explanations on how these EFPs will work and how each state program will result in providing the necessary information to conduct a complete stock assessment in the future. I am available for any questions about our concerns, so feel free to contact me. Thanks,

Capt. Bob Zales, II

Executive Director