

March 22, 2018

Peter Hood
Southeast Regional Office
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701

Re: NOAA-NMFS-2018-0029, Exempted Fishing Permits for Red Snapper

Dear Mr. Hood:

Thank you for the opportunity to comment on the final rule concerning Exempted Fishing Permits (EFPs) for state recreational management of Gulf red snapper. Share the Gulf is a coalition of chefs, restaurateurs, seafood businesses, fishermen, charter captains, conservationists and consumers who want to keep local Gulf fisheries fair and strong. Together with our member organizations, we represent thousands across the Gulf and work to ensure that anglers, local fishing businesses, restaurants, grocery stores and the communities who depend on Gulf seafood continue to have access to its resources. We support the approval of the state EFPs as long as the proposals adhere to conservation standards; have adequate monitoring, reporting, and catch accounting; and include only users that want to participate.¹

The Magnuson-Stevens Act (MSA) authorizes fishing under EFPs to test innovative approaches to fisheries management, among other objectives. A notable recent example was the Gulf of Mexico Headboat Collaborative EFP, which demonstrated that an allocation-based system in the for-hire fishery could allow year round fishing for headboat customers while decreasing bycatch by half. Using the flexibility of the EFP provision to address concerns about short recreational fishing seasons is appropriate. Private anglers deserve a management system that provides more flexible access while staying within science-based limits, and we support the states' efforts to address issues with the recreational sector through the EFP mechanism.

Since the approaches included in EFPs could have unpredictable effects, they should include safeguards to ensure that the EFP-authorized fishing does not harm the resource. The state management EFPs could meet that standard by insuring that catch limits will be adhered to through adequate monitoring, catch accounting, and evaluation. Thus, in its review the agency should examine how the states propose to monitor catch, handle quota overages (if any), and evaluate the programs after the first year.

It is also important that the state EFPs do not harm other user groups. While Share the Gulf supports the experimental management by the states for the private angler sector, the federal for-hire sector should be excluded from the EFPs in their current form. There are concerns surrounding the possible impact to the Gulf wide federal for-hire season of including

¹ Many for-hire captains have stated that they do not want to be managed by their state's EFP; they should be given that choice.

some for-hire operators in the EFPs and not others. Further, not all of the state EFPs explicitly preserve the division in quota between the for-hire and private angler components, known as “sector separation,” which enjoys vast support among for-hire operators and has led to a substantive conservation benefit in recent years.

Fishing and seafood are indisputably central to the Gulf’s economy and culture. Share the Gulf is committed to sustaining that economy and culture, including supporting solutions to tough problems. The state EFPs offer an exciting opportunity to examine state-specific recreational management approaches, provided adequate safeguards protect the resource and other user groups. Thank you for considering these comments in your evaluation of the EFP proposals.

Sincerely,

Chef Haley Bitterman
Corporate Executive Chef/ Director of Operations
Ralph Brennan Restaurant Group
Louisiana Chef Co-Chair

David Walker, Co-Chair
Owner/Operator, F/V June Sue
Alabama Fishing Co-Chair