



Dear Gulf Council Members and NOAA,

On behalf of the American Sportfishing Association, the trade organization for the sportfishing industry, I appreciate the opportunity to provide comments on Amendment 28 dealing with red snapper allocation. The saltwater angling community and industry recognize that the Gulf of Mexico provides some of the best angling offered in the world and red snapper fishing is an incredibly important component of the fishery. In 2011 saltwater sportfishing in the Gulf generated \$3.5 billion in retail sales and roughly \$2 billion in salary and wages. We the angler and supporting industry have a vested interest in recreational fishing and we provide a large percentage of this nations investment in fisheries management and science.

The Draft Options Paper for Amendment 28 does a good job of expressing the dilemma for the recreational angling community. We have gone from 365 day season to a 180 day season to a confusing 30+- day season this year with the likely prospect of less days in the future under the status quo. This is happening as the stock is rebuilding and after the Council has virtually stabilized the commercial red snapper fishery through catch shares and that fishery is profitable and supplies a very high end fish to the market. On the other hand the recreational fishery has been put in complete disarray and this is reflected in all of the snapper issues before the Council, not just allocation.

Every bit of information that has come in front of the Council has indicated that snapper allocation needs to be revisited. The latest information from the new MRIP survey suggests that it is possible that the recreational sector has always been fishing at a higher level and further supports an allocation revisit. We urge the Council to take action to stabilize the red snapper fishery for the recreational sector. We are currently focused on two of the six listed alternatives and are also responding to the following statement in the scoping document: **"This amendment does not include management alternatives that would adjust allocations in the event of a decrease in the red snapper quota below the preset limit. Council guidance would aid the development of alternatives applicable to potential decreases in the red snapper quota."**

#### **Alternative 5**

This alternative provides a 25% commercial, 75% recreational split of increases in allowable catch once the historic levels of 9.12 million lbs at a the current 51% commercial, 49% recreational division are reached. This provides for increased stability in the recreational sector by at least reducing the chances that fishing days will be further reduced. This alternative could be accompanied by a reduction formula when data indicates lowered populations and allowable catch is reduced. That reduction should first use the commercial sector levels down to the historic 51% of 9.12 million lbs before impacting recreational sector and reductions should then be proportional to the resultant ratio between the commercial and recreational sector. We argue for this reduction formula because the commercial catch share program is very profitable for those limited fishers in the program and a small reduction would have minimal impact. On the other hand the recreational fishery would again be destabilized which would have a greater negative economic impact to the nation.

#### **Alternative 6**

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This alternative provides that 100% of the increases in allowable catch, once the historic levels of 9.12 million pounds at the current 51 percent commercial, 49 percent recreational division are reached, be allocated to the recreational sector. This would provide for a much greater potential for stability than Alternative 5 for the recreational sector while maintaining the historic high in the commercial sector. We would suggest that 25 percent of the increase in allowable catch be set as a buffer that could be used to offset the current management capabilities to monitor real time recreational landings. This 25 percent could also be used toward the end of a season to extend the fishing season or allow a temporary increase in the subsequent season. This Alternative could also be accompanied by a reduction formula. We recommend that any required reduction in allowable catch be first taken from the recreational sector up to 25 percent of the allowable catch that is above the 9.12 million lbs benchmark. After that 25 percent reduction further reductions should be proportional between the recreational and commercial sectors.

We thank you for providing the opportunity to comment. We remain committed to working with the Council to solve the allocation issue. We realize that this amendment will not result in a significant increase in allowable days to fish but also strongly feel that an allocation shift will help to stabilize the recreational sector and restore some confidence in the recreational sector and we believe this to be incredibly important. As the process proceeds we remain open to new ideas on how to best accomplish amendment 28 and trust that the Council will recognize our comments and recommendations. We do not believe that sector separation should be part of amendment 28 and would oppose any attempt to enjoin the two issues.

Although this is outside the scope of Amendment 28 we want to continually remind you that we would also like the Council to revisit the issue of red snapper barotrauma mortality and the use of devices to reduce mortality. The Council could put an informational item on the next meeting agenda and hear from experts who have been testing these devices. While the Gulf Council has not seemed to take an interest in truly implementing these types of devices into the management of snapper or other species, other Councils have begun to see the significant impact these tools can have in reducing mortality of caught and released fish, ultimately leading to healthier stocks and greater fishing opportunities. We simply ask that this Council stay abreast of what is going on and determine how and when barotrauma mortality should be addressed from a management perspective.

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