



Leann Bosarge, Chairwoman
Gulf of Mexico Fishery Management Council
2203 North Lois Ave, Suite 1100
Tampa, FL 33607

January 27, 2017

Dear Madam Chair,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), please accept these comments on the following issues to be discussed at the Gulf of Mexico Fishery Management Council (Gulf Council) meeting in New Orleans, Louisiana this week.

Exempted Fishing Permit (EFP) – Electronic Video Monitoring (EM) Pilot Program

It should come as no surprise to hear that we support the EFP we submitted for your review. We believe that fishermen and sea turtles can coexist, and are requesting the opportunity to validate this through an EFP. We propose to demonstrate that up to eight bottom longline vessels working with onboard video cameras and a bycatch hotspot reporting program can successfully target grouper inside the summer longline closure without harming the rebuilding of sea turtle populations in the Gulf of Mexico. While a broad closure may or may not have been the most appropriate accountability measure put in place at the time, we believe that there should be the opportunity now to explore other options that aren't as economically harmful to fishermen *if* fishermen are willing to assume additional accountability and responsibility and *if* such a program doesn't impose substantial harm on sea turtle populations. Support for this EFP will be consistent with the Southeast Electronic Monitoring and Reporting Regional Implementation Plan, and we have been working diligently with the Southeast Regional Office (SERO) and the Southeast Fisheries Science Center (SEFSC) for over a year to develop this proposal.

I want to take this opportunity to provide additional clarification for the EFP based on feedback we received through our outreach efforts last week:

- We believe the results of this two year program will demonstrate that fishermen, scientific partners, and the National Marine Fisheries Service (NMFS) can build a mechanism that simultaneously maintains responsible fishing access and sea turtle protections. This could come in the form of a rigorous program that would allow limited access to this closure rather than removal of this closure in its entirety. However, we urge the Gulf Council and NMFS to regularly and frequently review the effectiveness of this and any closure to determine whether it/they continue to meet their objectives.
- Analysis of commercial bottom longline fishing variables are beyond the scope of this EFP. Our priority is to test the efficacy of cameras to account for and avoid sea turtle bycatch. Given the

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necessary limited nature of this EFP, there was concern that a statistically sound dataset would be difficult to generate with such a large number of commercial longline fishing variables (e.g. hook size, offset, and gauge; bait type; gangion length and gauge; mainline length and gauge; soak time; setting and haulback speed; habitat/substrate; fishing depth; oceanographic and atmospheric conditions, etc)

- We set the cap at eight vessels because this represents approximately 12% to 15% of the active reef fish bottom longline fleet in the Gulf of Mexico. Working with fewer vessels would diminish the robustness of our dataset, while working with more vessels may push the definition of “limited testing” – a qualifying criteria for any EFP. Hardware limitations would present an additional problem. Finally, it’s critically important to the success of this EFP to be able to work with a small but dedicated group of captains that are committed to its success. If this manageable group of captains can help build a viable program that works, then there’s no reason why this program shouldn’t then be available to qualifying and committed fishermen in the future.
- Up to four cameras are installed onboard these vessels – one at the hauling station and up to three others on deck. Anything brought up in the gear will be viewed and accounted for, as will anything removed from the gear and brought on deck. Camera installation is vessel-specific, but done in a way where there are no blind spots where catch can go unaccounted for.
- The Shareholders’ Alliance supports the development of a *voluntary* camera/EM program that is approved by NMFS and allows fishermen to use camera if they so choose. We understand how this technology is working for commercial fishermen in Alaska, California, and New England and we believe that fishermen in the Gulf deserve this opportunity as well. We do not support blanked fleet-wide mandatory camera requirements.

We hope that you will provide NMFS the opportunity to address and approve this EFP in time for data collection to begin June 1 of this year.

Reef Fish Amendment 36B

We welcome the opportunity to have a deliberate discussion about the successes and shortcomings of the two IFQ systems in the Gulf of Mexico, as well as develop ideas for viable solutions that solve legitimate problems.

While the results of the Red Snapper Individual Fishing Quota (IFQ) Five Year Review are available, NMFS has yet to provide the results of the Grouper-Tilefish IFQ Five Year Review. If the results of Amendment 36B are intended to apply to both IFQ programs, makes the most sense to initiate this discussion after we receive the Grouper-Tilefish Five Year Review analysis so that the Gulf Council has enough information to make an informed decision.

When considering these discussions, we urge the Gulf Council to think through:

- Whether the “problem” is real or perceived and how to make this determination.
- The intended and unintended consequences (positive and negative) of modifications to the two IFQ programs.
- The impact of changes on existing fishing businesses and the seafood supply chain.
- Whether the “solution” actually solves a defined, legitimate, and agreed-upon “problem.”
- Whether the IFQ programs are meeting their intended goals and objectives.

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The Shareholders' Alliance is committed to educating the Gulf Council and stakeholders throughout this process on the true impacts of IFQ changes to fishermen and fishing businesses in the Gulf.

Corals/Habitat

The Shareholders Alliance supports the protection of corals. Corals and complex coral habitats help support healthy fish populations which, in turn, support healthy fishing businesses. However, we believe that there are better ways to address coral protections than large, permanent fishing closures. We believe that preserving historical fishing access and preserving complex coral habitats are not mutually exclusive concepts.

As was evidenced at the meeting of the Pulley Ridge Working Group, Amendment 7 still has a long way to go. We look forward to getting more, more accurate, and more recent information about proposed habitat areas of particular concern (HAPCs) in the Gulf, including *all* commercial fishing data, and look forward to providing more input on historical fishing in these areas. We also look forward to getting more information about the true impacts of the Gulf's commercial fishing gear on these habitat areas in the context of all impacts on corals (e.g. oil and gas exploration, climate change, sedimentation, ecosystem shifts etc).

For-Hire Electronic Reporting

We encourage the Gulf Council to take final action at this meeting and to prevent further delay in implementation of this important fishery tool.

Ad Hoc Private Angler Advisory Panel (AP).

We encourage the Gulf Council convene this advisory panel (AP) as soon as possible after this January Gulf Council meeting to develop a viable solution(s) to the ongoing problems in the private angler sector of the recreational red snapper fishery. According to the most recent NMFS data, in 2016 the private angler sector exceeded its quota by 20% and its annual catch target by 50% (with some data still outstanding). Clearly, the existing state and federal management strategies are not working. It's time for a real solution, and we are looking to the AP to provide that.

Thank you for the opportunity to comment.

Sincerely,



Eric Brazer, Deputy Director
Gulf of Mexico Reef Fish Shareholders' Alliance