



August 11, 2014

Mr. Doug Boyd, Chairman
Gulf of Mexico Fishery Management Council
2205 North Lois Avenue
Suite 1100
Tampa, Florida 33607

RE: Framework Action on Accountability Measures for the Recreational Red Snapper Fishery

Dear Chairman Boyd,

The Pew Charitable Trusts (Pew) appreciates the opportunity to comment on the recreational red snapper accountability measures (AMs) framework action scheduled for final approval at the August 2014 Gulf of Mexico Fishery Management Council (Gulf Council) meeting. We urge the Gulf Council to adopt both in-season and post-season AMs that provide reasonable assurance that chronic recreational annual catch limit (ACL) overages will stop. These measures are necessary to keep the red snapper population's recovery on track and comply with both federal law¹ and the recent *Guindon vs. Pritzker* court order.²

Specifically, we support the Gulf Council's preferred alternatives:

- 1) **Action 2.1, Alternative 2:** Apply a 20% buffer to the recreational quota based on the ACL/ACT Control Rule;
- 2) **Action 2.2, Alternative 2:** While red snapper is under a rebuilding plan, if the recreational red snapper quota is exceeded, deduct the full amount of the overage from the recreational quota in the following season. The recreational ACT will be adjusted to reflect the previously established percent buffer.

We remain concerned that an annual catch target (ACT) that applies a 20% buffer to the recreational quota may not be conservative enough to prevent quota overages based on the percentage by which this sector's quota was exceeded in years past. However, if the Gulf Council adopts this buffer in tandem with a 100% payback provision, as proposed in the Red Snapper Accountability Measures Framework Action, that risk is mitigated and thus we can support a smaller buffer. Together, the combination of an ACT³ and payback provision⁴ is

¹ 16 U.S.C. § 1853(a)(15)

² *Guindon v. Pritzker*, Case 1:13-cv-00988-RWR, filed 06/28/13.

³ 50 CFR 600.310(g)(2).

⁴ 50 CFR 600.310(g)(3).

consistent with the National Standard 1 guidelines and with how the Gulf Council applies accountability measures to the region's other overfished species.

We urge the Gulf Council to adopt these AMs and finalize the Framework Action at the August 2014 meeting so they will be in place for the 2015 fishing season. This is an important step to set up a system that prevents overages, guards against a return to overfishing, and keeps this population on the road to recovery. We view these measures as a foundation of good conservation practices, upon which we encourage the Gulf Council to build a more comprehensive package of reforms to address the challenge of high angler demand for this limited resource.

Thank you for the opportunity to provide comments on red snapper recreational accountability measures. We look forward to continuing to work with the Gulf Council, staff, and stakeholders on improving the recreational fishery and related issues in the region.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chad W. Hanson".

Chad W. Hanson
Officer, U.S. Oceans, Southeast
The Pew Charitable Trusts