



December 4, 2013

Gulf of Mexico Fishery Management Council  
2203 North Lois Avenue  
Suite 1100  
Tampa, Florida 33607

Dear Gulf Council:

The Recreational Fishing Alliance (RFA) supports the alternative proposals outlined in Reef Fish Amendment 28 to shift up to 100% of any total combined commercial and recreational quota in excess of 9.12 million pounds of red snapper to the recreational sector in the Gulf of Mexico.

There has been plenty of debate between the commercial and recreational fishing sectors regarding Gulf of Mexico red snapper, with those holding the greater 51% allocation claiming "*it's fair as it is*" while those granted 2% less left asking for sensible relief from burdensome restrictions.

The concept of "fairness" was memorialized in the 1980's when the commercial sector was gifted the additional percentage of quota. However, a lot has changed in the past 30 years, including a reduction in the number of commercial license holders, while the total number of recreational anglers has increased throughout the Gulf.

A total allowable catch (TAC) for Gulf of Mexico red snapper harvest at the 9.12-million-pound mark represents the highest allowable harvest of red snapper since the original allocation was set by managers. With fewer commercial fishermen fishing today - and now doing so under an individual fishing quota (IFQ) system aimed at capacity reduction - the 51% of the 9.12 million pounds provides a reasonable and economical harvest of 4.65 million pounds to the commercial sector.

But while 4.65 million pounds of commercial red snapper harvest represents the highest commercial quota in more than three decades, the recreational fishing sector has gone from a 195-day fishing season with a four fish per angler bag limit, to less than 45 days on the water with just a two fish per angler bag limit. While a 51 to 49 allocation percentage may seem fair on paper, the overall reduction in available fishing days for the recreational fishing community since 2007 and the grave impact this has had on our coastal tourism economy is neither fair nor reasonable to the public resource users.

Based on the alternative proposals outlined in Reef Fish Amendment 28 calling for an increase in the recreational red snapper quota *only* if the total snapper quota is greater than 9.12 million pounds, RFA would support adjusting the allocation percentage of any additional red snapper quota to a minimum of 90% for the recreational sector and 10% for the commercial sector, until a point at which fisheries managers determine that anglers can return to the original 195-day fishing season and four fish bag limit.

This limited adjustment to dealing with additional quota above the 9.12-million-pound is truly the fair approach, in that it provides both sectors with a return to sensible harvest numbers previously enjoyed by both sectors at the start of the red snapper rebuilding period.

Successful rebuilding of the Gulf of Mexico red snapper fishery has most recently afforded a 9.3-million pound quota for both the commercial and recreational sectors under the original 51%-49% allocation scheme. While the angling community remains saddled with draconian allowable fishing season of between 25 and 45 days, there have been numerous statements made on-record by commercial representatives before the Gulf of Mexico Fishery Management Council about the drop in market price for red snapper when the commercial quota exceeds 5 million pounds.

Considering the 51/49 allocation and the market loss experienced by the commercial fishing industry when more than 5 million pounds of red snapper floods the consumer market, perhaps it would be in the best interest of the entire fishery if the commercial sector be capped at the 5-million pound mark. That could best be accommodated by this type of two-tiered allocation approach which allows the commercial/recreational allocation to gradually and reasonably shift toward the recreational sector as the stock rebuilds.

Such an approach would protect the commercial sector from potential overages in the recreational sector while providing a mechanism that will address the growing concern about increased availability causing ever decreasing recreational red snapper seasons.

While ownership of most of our nation's public resource is leased and our renewable public resources reforested by corporate entities, the commercial sector was essentially gifted their allocation in 2007 with their quota allotment memorialized. These share owners pay nothing for this private allocation of red snapper, while the general public is handed a bill to pay for management and enforcement of this red snapper giveaway program.

Meanwhile, that same taxpaying public has been forced off the water for 6 additional months of the year, forced to accept draconian fisheries regulations reducing the available fishing days by upwards of 80% since 2007.

RFA therefore supports the Gulf of Mexico Fishery Management Council moving forward with an allocation plan that provides at minimum 90% of any red snapper quota above 9.12 million pounds to the recreational sector until the recreational sector landings are brought back to 2007 levels, a time when the public was allowed a more reasonable bag limit and 195 days of recreational fishing. The recreational sector should be given equal opportunity to enjoy the benefits of a rebuilt stock.

Sincerely,



Jim Donofrio  
Executive Director