



April 10, 2014

Mr. Richard Corbett, Chairman
Florida Fish and Wildlife Conservation Commission
620 S. Meridian Street
Tallahassee, Florida 32399-1600

Chairman Corbett:

On behalf of The Pew Charitable Trusts, please accept these comments regarding the proposed Gulf Offshore Recreational Fishing Permit (offshore permit). We support the Commission in developing this offshore permit and would like to see it ready for full implementation by 2015. Requiring the permit for all adult anglers who target reef fish species - as is currently proposed - is an important component to ensure this program is truly effective in providing improved data on recreational catch of reef fish species. However, we feel this approach would be improved by also including the full suite of species managed in the reef fish complex, which we discuss in more detail below.

The offshore permit is an important first step to more precisely identify those who target offshore species such as red snapper, gag and amberjack. For years, one of the common themes at federal fisheries meetings is a lack of confidence in the data used to assess and manage the recreational fishery. Narrowing the universe of anglers that target federally managed fish (rather than surveying random coastal households) and focusing data collection on offshore trips (in addition to the current practice of surveying all anglers, including those who fish from shore or only in state waters for state-managed species) will improve the catch and effort estimates in the reef fishery off Florida's Gulf Coast. This in turn will enhance stock assessments, which are the basis for fishery management decisions such as season length and annual catch limits. Data gathered through the offshore permit can lead to sounder management decisions, and help to address concerns raised by stakeholders about the data used to manage recreational reef fish fisheries. It could also set the stage for management measures such as fishing season dates that are tailored to better address regional differences.

To fully achieve the goal of more precise catch and effort data for reef fish species, it is important that this offshore permit:

- Apply to all adult anglers who target federally managed reef fish species in Florida, and
- Include the full reef fish complex, including white grunt, black sea bass, red porgy, and all snappers and groupers.

The species selected for inclusion under this proposal are likely the primary targets for most offshore anglers, and account for about 75% of the reef fish landings.¹ However, this may lead to gaps in recreational catch and effort data for this suite of species and undermine the goal of the offshore permit. For example, anglers who primarily target other reef fish, such as grunts, sea bass, and porgies may still catch some of the reef fish species included under this proposal and that data could be missed. Additionally, covering all reef fish under this offshore permit will minimize angler confusion and aid enforceability.

Similarly, this offshore permit should be mandatory for offshore adult anglers who are otherwise exempt from saltwater fishing license requirements.² In particular, it is important to include anglers who are 65 and older as they make up about 15% of the fishing public in Florida.³ The small transaction fee – generally less than \$5 - that may be incurred by those who are not otherwise required to have a saltwater fishing license is reasonable to ensure more accurate data on the catch of a public resource. Together, these two important components will help to ensure the program's success.

As you know, the Marine Recreational Information Program (MRIP) is used to monitor most of the recreational fisheries in Florida and elsewhere. Not only is it the primary data source for offshore species such as many snapper and groupers, **MRIP is also the main source of information for most recreationally important inshore species such as redfish, seatrout, and snook.** It is important to maintain the continuity of this program as it provides crucial information for both state and federal stock assessments on long-term population trends. We are very pleased that the Commission's approach is designed to integrate with MRIP and provide the continuity of data that is necessary if this proposal is to truly result in better estimates of recreational catch and effort. Staff should be applauded for their work to address this important element during the initial design of the offshore permit.

In addition, it is important that Florida's data collection system is compatible with programs in other Gulf States, as much as possible, for offshore species that are managed and assessed gulf-wide. Thus, we encourage staff to continue coordinating with partners and stakeholders across the region to ensure that data collection programs for species managed Gulf-wide are cohesive.

Other important information, in addition to catch and effort data, should be obtained on the offshore fisheries through the data collection portion of this permit program. For example, improved information on fish caught but not kept could provide a better understanding of the numbers and fate of discarded fish. As you know, the depth at which a fish is caught plays a crucial role in whether or not it will survive if released. For species where release mortality rates are estimated to be high, the annual catch limit may be reduced to account for this bycatch mortality, either directly when setting limits or indirectly through stock assessments. More refined information on discards and bycatch can improve stock assessments and provide a more accurate picture of fishing mortality and the population. This in turn could result in more fish

¹ Personal communication with Florida Fish and Wildlife Conservation Commission staff.

² Not including anglers younger than 16 who can be included in the surveys but should be exempt from this permit.

³ U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation in Florida. This percentage includes all saltwater and freshwater anglers over 16.

available to be caught by anglers and higher catch limits. Additionally, more refined spatial information on offshore fishing should be collected to link depth and habitat information with catch and species. This type of information can also further enhance stock assessments as well as aid in advancing a more comprehensive, ecosystem-based approach to fisheries management. We encourage staff to address this as part of the data collection program associated with the offshore permit as it would provide highly valuable information.

We commend the efforts of the Commission's staff and the stakeholders who have championed this offshore permit. There is broad agreement in the fishing and conservation communities that more refined and timely data on the offshore recreational fisheries are needed. We believe it offers a much improved approach that can be used to enhance stock assessments and fine tune management strategies. We look forward to working with the Commission, staff and stakeholders to advance this important step forward for Florida's offshore fisheries.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad W. Hanson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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