



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<http://sero.nmfs.noaa.gov>

F/SER24:SB

The Alabama Charter Fishing Association Cooperative
c/o Iris Ethridge, Cooperative Manager
c/o Tom Steber, Director
26619 Perdido Beach Boulevard
Orange Beach, Alabama 36561

SEP 11 2014

Dear Ms. Ethridge and Mr. Steber:

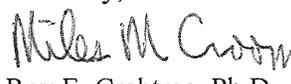
This letter responds to your application, dated January 15, 2014, and submitted to NOAA Fisheries via e-mail on March 12, 2014, for an exempted fishing permit (EFP) to examine an alternative allocation-based management system for for-hire vessels that fish for red snapper in the Gulf of Mexico. NOAA Fisheries solicited comments on the application from the Gulf of Mexico Fishery Management Council (Council), the five Gulf of Mexico states, the U.S. Coast Guard, and the general public. After reviewing your application and comments received, NOAA Fisheries is denying your application.

The EFP, if issued, would have allowed federally permitted for-hire vessels participating in the Alabama Charter Fishing Association Cooperative (Cooperative) to harvest an allotted amount of red snapper outside the normal red snapper recreational season. The Cooperative identified approximately 90 Alabama vessels eligible to participate in the program. The stated intent was to better document the viability of an allocation-based management strategy for recreational harvest of red snapper.

The Council, Alabama, and the majority of public comment received supported the EFP application as a promising approach to address long-standing issues regarding the management of red snapper in the Gulf of Mexico. Texas, Louisiana, and Florida submitted letters in opposition to the EFP. The three opposing states had concerns that the EFP would provide an unfair economic advantage to for-hire vessels in the state of Alabama, potentially harming the economic stability of for-hire vessels located in close proximity to Alabama. They were also concerned that this application is similar to an ongoing Gulf Headboat EFP that allows headboats distributed across the Gulf of Mexico to conduct an allocation-based management program for red snapper recreational fishing, and thus this proposed activity would provide little new information that would warrant the approval of an additional EFP.

We support and recognize the need for long-term change in the management of the Gulf of Mexico recreational red snapper fishery but believe that change should be adopted through the fishery management council process rather than through a short-term EFP. Although the Cooperative identified some differences between this EFP and the Gulf Headboat EFP, we are concerned this proposal is very similar to the Gulf Headboat EFP and therefore issuance of the EFP would be inconsistent with the intent of the EFP regulations at 50 CFR § 600.745(b). NOAA Fisheries appreciates your organization's continued active involvement in the management of our fishery resources of the Gulf of Mexico, and we hope to continue working together to seek collaborative solutions to the long-standing challenge of red snapper management.

Sincerely,


for Roy E. Crabtree, Ph.D.
Regional Administrator

