



good data- good science- good management -good fishing

**Fishing Rights Alliance**  
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## **Tab B, No. 6(c)**

July 27, 2007

Gulf of Mexico Fishery Management Council  
2203 North Lois Avenue  
Suite 110  
Tampa, FL 33607

Dear Gulf Council Members,

I am Dennis O'Hern, Executive Director of the Fishing Rights Alliance, a group of anglers and fishermen dedicated to protecting our fisheries and our heritage of fishing.

Regarding Tab B6(a) Gag revised analysis, we have grave concerns with the derivation and application of certain values used in the re-analysis of the gag grouper stock assessment for the Gulf of Mexico.

The value being used for discard mortality, although adjusted from the original 36% value derived during SDEDAR 10 to 20% is still, in our opinion, not reflective of actual discard mortality. Tab B6(a), table 2 (shown from Tab B6), shows mortality figures which do not reflect the FWC study's observed mortality for depth, nor does it accurately reflect the average depth of each of the given regions. For example, the peninsula/keys less than 10 miles shows an average depth of 10 meters, when in fact most of the area is less than 30 feet altogether, with an average depth somewhere in the five meter range. 15 feet of water does not cause a barotrauma event, and 50 percent of the estimated discard number is released in 15 feet of water. Yet, even those shallow releases are being assigned an 11% mortality rate.

Region	Zone	Average depth (m)	%mort
Panhandle	Inshore	10	11
Panhandle	Ocean<10	20	18
Panhandle	Ocean>10	40	42
Peninsula/Keys	Inshore & Ocean<10	10	11
Peninsula/Keys	Ocean>10	30	29

Table 2. Assigned average depth (m) and corresponding discard mortality (% mort) for each of the regions (Panhandle and Peninsula plus Florida Keys) and depth zones (inshore, Ocean < 10 miles, and Ocean > 10 miles).

Because of our concern, we have requested that the Southeast Fisheries Science Center run the model with a 10% and 7% overall discard mortality rate for the recreational landings. Alex Chester of the SEFSC said yesterday that it could be done and Luiz Barbieri of Florida’s Fish and Wildlife Research Institute agreed that he would like to see the results of these runs.

We are also have concerns about the average weight of the regulatory discards, which fluctuate wildly from year to year and show an astonishing jump for the year 2004.

We ask that the Council request these model runs from the SEFSC, if they are not already in process at the time of your consideration of this matter. We further ask that the Council review the results of these runs before making regulatory decisions on gag grouper, as we feel that these runs would provide a more accurate assessment of the stock.

We remind the Council members of the great uncertainty surrounding the assessment and the fact that the Gulf Council’s own SSC was so divided as to narrowly avoid deeming the assessment unreliable. Much uncertainty remains. We feel that the runs using lower mortality rates and a corrected discard weight would yield a more accurate picture of the stock.

Thank you for your consideration.

Sincerely,

Dennis O’Hern  
 Executive Director  
 Fishing Rights Alliance

