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January 23, 2026

The Honorable Howard Lutnick  
Secretary, United States Department of Commerce  
1401 Constitution Ave, NW  
Washington, D.C. 20230

Secretary Lutnick,

The contents of this letter and attachments are in follow up to correspondence received on January 9, 2026, from NOAA Fisheries (NOAA) to the Florida Fish and Wildlife Conservation Commission (FWC) related to FWC's Exempt Fishing Permit (EFP) application to assume management of Red Snapper in the South Atlantic on behalf of the People of Florida beginning in 2026 (response letter).

On November 10, 2025, FWC formally submitted Florida's South Atlantic Red Snapper EFP that, upon approval, will allow for a 39-day season for Red Snapper in the South Atlantic, a clear improvement from the two-day federal season in 2025. As noted in the EFP, Florida leads the nation in fisheries management, a widely recognized fact throughout the western hemisphere. In fact, in the last year alone, FWC has received requests from both the Bahamas and Bermuda to share best practices on species management and enforcement, just as we do on behalf of the federal government for numerous species in federal jurisdictional waters.

First, we want to reinforce our appreciation for your unwavering commitment to **rein in bureaucracy and return the power of fisheries management and conservation to the states where it belongs.** Unfortunately, based on an initial review of the commentary and questions within NOAA's response letter, it appears that NOAA intends to delay the success of our shared goals. To ensure that this is not the case, we determined that directly responding to you, rather than through NOAA, was crucial to our shared success. To that end, to mutually maintain the momentum that our teams have built over the past year, it is abundantly clear that direct involvement from our offices is crucial. If not, based on precedent, career NOAA staff will **inevitably create a bureaucratic blockade at the behest of status-quo defending adversarial interests** to prevent Florida's EFP from going into effect in May 2026. Given the social, economic, and cultural importance of recreational fishing in Florida, we greatly appreciate your leadership in seeing Florida's application through to approval so **Floridians can enjoy their God-given rights to recreate, and enjoy, our natural resources.**

Under President Trump's leadership in 2017, Commerce Secretary Wilbur Ross blazed a trail in the Gulf of America to state management of recreational Red Snapper fishing. Bureaucratic intransigence and inertia at NOAA were guiding anglers to the dead end of federal regulators' overreach. By 2018, all five states in the Gulf of America were firmly in control of their destiny and managing this public fishery for the benefit of the public. The number of days of fishing proposed Gulf of America-wide by NOAA Fisheries in **2017: three days.** The number of fishing days announced by Florida Governor Ron DeSantis in **2025: 127 days.**

Based on Florida's experience in seeking assignment of state management authority in the Gulf of America, much of NOAA's response appears to potentially **delay action under the guise of "data" collection**—the same tactics that led

**Congress to force NOAA to accept and approve state EFP's in the Gulf of America given the weaponization of NOAA under President Obama.** However, we also recognize some updates to our application were necessary and appreciate the opportunity to clarify.

With that in mind, FWC has drafted our follow-up into two parts. First, FWC has provided written comments within this correspondence that are of the most importance to ensure the effective execution of Florida's EFP. The remainder of our response, including an updated draft of our EFP and answers to NOAA's line of questioning, can be found in Appendix A.

### **NOAA Fisheries is Provided Broad Flexibility in Authorizing an EFP**

Importantly, there is nothing in the Magnuson–Stevens Act (MSA) that dictates an EFP's harvest be included in annual catch limits. MSA merely required regulations for EFPs be established. Peppered throughout NOAA's January 9<sup>th</sup> response letter are references to 50 CFR 600.745(b), the general framework in which NOAA reviews and approves EFPs. Based on a preliminary review of the response and the continued references to "data collection and research" it is clear that NOAA's initial review is not from the lens of flexibility, which is provided throughout the referenced CFR. In a spirit of transparency, we have provided screenshots of the federal references in which provide flexibility that all EFPs seek.

### ***Exhibit 1: EFP Application Requirements & Issuance Criteria***

- (2) Application. An applicant for an EFP shall submit a completed application package to the appropriate Regional Administrator or Director, as soon as practicable and at least 60 days before the desired effective date of the EFP. Submission of an EFP application less than 60 days before the desired effective date of the EFP may result in a delayed effective date because of review requirements. The application package must include payment of any required fee as specified by paragraph (b)(1) of this section, and a written application that includes, but is not limited to, the following information:
  - (j) The date of the application.
  - (k) The applicant's name, mailing address, and telephone number.
  - (l) A statement of the purposes and goals of the exempted fishery for which an EFP is needed, including justification for issuance of the EFP.
  - (m) For each vessel to be covered by the EFP, as soon as the information is available and before operations begin under the EFP:
    - (A) A copy of the USCG documentation, state license, or registration of each vessel, or the information contained on the appropriate document.
    - (B) The current name, address, and telephone number of the owner and master, if not included on the document provided for the vessel.
  - (n) The species (target and incidental) expected to be harvested under the EFP; the amount(s) of such harvest necessary to conduct the exempted fishing; the arrangements for disposition of all regulated species harvested under the EFP; and any anticipated impacts on the environment, including impacts on fisheries, marine mammals, threatened or endangered species, and EFH.
  - (o) For each vessel covered by the EFP, the approximate time(s) and place(s) fishing will take place, and the type, size, and amount of gear to be used.
  - (p) The signature of the applicant.
  - (q) The Regional Administrator or Director, as appropriate, may request from an applicant additional information necessary to make the determinations required under this section. An incomplete application or an application for which the appropriate fee has not been paid will not be considered until corrected in writing and the fee paid. An applicant for an EFP need not be the owner or operator of the vessel(s) for which the EFP is requested.
- (3) Issuance.
  - (i) The Regional Administrator or Director, as appropriate, will review each application and will make a preliminary determination whether the application contains all of the required information and constitutes an activity appropriate for further consideration. If the Regional Administrator or Director finds that any application does not warrant further consideration, both the applicant and the affected Council(s) will be notified in writing of the reasons for the decision. If the Regional Administrator or Director determines that any application warrants further consideration, notification of receipt of the application will be published in the FEDERAL REGISTER with a brief description of the proposal. Interested persons will be given a 15- to 45-day opportunity to comment on the notice of receipt of the EFP application. In addition, comments may be requested during public testimony at a Council meeting. If the Council intends to take comments on EFP applications at a Council meeting, it must include a statement to this effect in the Council meeting notice and meeting agenda. Multiple applications for EFPs may be published in the same FEDERAL REGISTER document and may be discussed under a single Council agenda item. The notification may establish a cut-off date for receipt of additional applications to participate in the same, or a similar, exempted fishing activity. The Regional Administrator or Director will also forward copies of the application to the Council(s), the U.S. Coast Guard, and the appropriate fishery management agencies of affected states, accompanied by the following information:
    - (A) The effect of the proposed EFP on the target and incidental species, including the effect on any TAC.
    - (B) A citation of the regulation or regulations that, without the EFP, would prohibit the proposed activity.
    - (C) Biological information relevant to the proposal, including appropriate statements of environmental impacts, including impacts on fisheries, marine mammals, threatened or endangered species, and EFH.

As noted in Exhibit 1, NOAA provides themselves with broad deference in determining the completeness of an EFP. In NOAA's January 9 response, the agency asks for a number of fish to be harvested in the EFP. And in conversations with NOAA leadership, it was suggested to "throw out a number" for consideration. The Florida EFP limits harvest by number of fishing days and other fishery management tools, e.g. bag and aggregate bag limits. The results will inform future management and conservation of the fishery in the region. The EFP is not predicated on a number of fish, and for NOAA to request a number—even an estimated number—is inappropriate and unnecessary. The State of Florida uses similar approaches with state-managed fisheries with routine success in conservation outcomes. NOAA's request to guess at a number is **inconsistent with scientific management standards** at the FWC.

***South Atlantic v. Gulf of America Fisheries***

While Florida's EFP references the pathway leverage in the Gulf of America, the process in the South Atlantic will be different based on the geography and unique challenges of the area. We appreciate NOAA recognizing this in their correspondence. To that end, Florida's EFP did not mirror the Gulf of America exactly because of decades of mismanagement in the South Atlantic. For example, consider the way NOAA Fisheries manages Red Snapper in the South Atlantic in comparison to the Gulf of America. In the South Atlantic, dead discards are directly taken "off the top" of the Red Snapper ACL, reducing allowable recreational harvest from 365,404 fish to 22,797 fish. In the Gulf of America, discards are not "taken off the top," providing significantly more harvest opportunities. While we are elated that Department of Commerce leadership share our desire for a more agile NOAA Fisheries, there is not a clear indication that NOAA Fisheries will abandon its discrimination of South Atlantic Red Snapper and treat it like every other fishery in the southeast United States. Simply put, if Florida was to base our response on a "quota", state-led management would be near impossible, which is exactly what is sought by defenders of the state quo, including environmental NGOs, which seek to keep Florida anglers off the water.

As a result of NOAA Fisheries' historic discrimination against South Atlantic Red Snapper, allowable harvest has been drastically reduced and is part of the reason why anglers in Florida have been condemned to fishing seasons of zero, one or two days. With the fishery essentially closed for the last 15 years, states are unable to use catch history to set state-specific quotas. Given that NOAA Fisheries has not announced plans to treat South Atlantic Red Snapper like every other fishery in the southeastern United States, Florida's initial EFP takes the step of leading on this matter where NOAA has been unable or unwilling. In short, the problems with South Atlantic Red Snapper management are problems of NOAA's own making. However, Florida is motivated to solve NOAA's problem given the importance of the fishery to our State. While the Gulf of America EFP process was important, it should not be used to establish fixed guidelines for the SA states to follow, given the differences referenced above.

***Inaccurate NOAA Data Should Not Be the Standard for EFP Approval***

NOAA Fisheries states that in the Gulf of America, state-specific quotas were used to set up state management. However, prior to Secretary Ross approving the Gulf of America EFPs, each state had its own data collection program to generate these projections. These programs, approved by NOAA Fisheries for use in management, allowed the states to collect data on their own and manage Gulf of America Red Snapper off their respective coasts using data consistent with the Best Scientific Information Available (BSIA), the standard required by federal law.

Unfortunately, this has not been the case historically in the South Atlantic. Aside from Florida, no other South Atlantic state has its own data collection program. It should be noted that Georgia, South Carolina, and North Carolina have designed their EFPs to include the creation and testing of state data-collection programs which places Florida in a more advantageous posture for immediate approval when compared to our Northern neighbors. This was further reinforced in letters to you from South Atlantic Governors and Attorneys General in 2025.

Of note the reason Florida has been able to lead is simple: **we funded our own programs when NOAA failed to act**. Therefore, setting an appropriate and defensible harvest level or “quota” would be hard sought for most states at this time,

which, as reflected in Exhibit 1, is why we believe NOAA must use its discretion and utmost flexibility in approving these EFPs. This will ensure that the primary impetus behind the states’ EFPs—to generate improved, regionally consistent information necessary to better quantify recreational fishing effort and discards for Red Snapper throughout the South Atlantic—is met.

If NOAA Fisheries requires states to estimate projected landings for the purpose of quota monitoring, all states (aside from Florida) would be forced to rely on MRIP data. Using this data represents a fundamental issue that would only serve to keep the South Atlantic states in the same vicious cycle of disinformation that we presently find ourselves in. MRIP data are considered the BSIA by NOAA Fisheries, and therefore, these data are used by the agency to determine the 1-2 day South Atlantic Red Snapper season length. However, MRIP was never designed for the management of short fishing seasons or real-time quota monitoring. These short fishing seasons directly contribute to highly inaccurate data collected from MRIP, as evidenced by Percent Standard Error (PSEs) that are routinely higher than 50%. But because MRIP is considered BSIA, NOAA Fisheries uses this notoriously inaccurate data to further justify extreme access restrictions. More frustrating is that NOAA’s own policy states that MRIP data with a PSE above 50% **should not** be used for management purposes, yet NOAA Fisheries uses exactly that data for South Atlantic Red Snapper. **MRIP data for South Atlantic Red Snapper is not credible and should not be considered BSIA**.

The low recreational catch limit of 22,797 fish is entirely dictated by removing dead discard estimates from the 365,404 fish recreational quota. Unfortunately, these discard numbers are even more unreliable than MRIP harvest data, as nearly ALL discard estimates have PSEs higher than 50%, with some higher than 100%. This vicious cycle needs to end and MRIP is not the answer.

These EFPs provide an opportunity to escape this untenable situation and use scientifically defensible methods to obtain more accurate recreational data for management purposes. To resolve this issue, the South Atlantic states are requesting at least 1-2 years of state data collection to determine state-specific landings projections, which can then be used to set future fishing seasons.

Setting state seasons using a fixed season length defines a fixed time-period when Florida anglers will be able to retain Red Snapper. The State of Florida is not asking to open Red Snapper for 365 days. Rather, we are testing a fixed summer season and fall weekends with which to set the effort model to ascertain what a reasonable future quota for our state could be, and a season that aligns with Florida’s cultural heritage and preferences for fishing. While our EFP was intentionally broad, FWC’s relationship with anglers and stakeholders informed this decision making and is

further reflected in the revised EFP. The Topping et al. paper<sup>1</sup>, our experience with setting the Gulf of America Red Snapper season since 2018, and year 1 of our three current Atlantic Red Snapper previously issued research EFPs have given us data to indicate that the effort put forth by our anglers will drastically change when they are offered a longer Red Snapper retention season in the South Atlantic.

### ***Florida's Approach is Responsible***

As reflected in the EFP, our anglers will also be confined to a snapper/grouper aggregate bag limit that once reached will require ceasing of bottom fishing for that trip, the lack of a size limit aims to reduce highgrading, and a South Atlantic Red Snapper bag limit of 1-fish will also further constrain any attempt of overfishing. As with our current three Atlantic Red Snapper Research EFPs, this state management EFP will allow us to determine how our defined season changes effort and behavior within our 39-day proposed research project for state management year 1.

Florida's angling community wants a vibrant, sustainable fishery based on their actual experience on the water. We know our pathway works. The State of Florida believes NOAA has the discretion not to require a number of fish in this EFP.

### **NOAA Must Swiftly Review and Offer Feedback to Florida**

NOAA took 60 days to respond to Florida's initial EFP, and as transmitted to FWC, it appears to **delay issuance at third & goal, with a fourth & long approach**. It is our hope that the contents of this response, included in Attachment A, provide NOAA the necessary information to trigger publishing receipt in the Federal Register to ensure swift completion of the necessary steps for EFP issuance. Further, as noted in Exhibit 1, NOAA is provided with much regulatory flexibility, and it is up to the agency to act with agility, rather than ambiguity. As noted in NOAA's response letter in Exhibit 2, we seek timely approval and will make our teams available 24/7/365 to see this application through to approval.

### ***Exhibit 2: NOAA's Response Referencing "Timely Approval"***

We are ready to work with you to address the information requested further to these points. Please review *Attachment A* and submit the update to your application by January 23, 2026. This will allow us to expeditiously complete our review and proceed to the next steps. It is our shared goal to have a timely approval of this important pilot project and we will strive to accomplish this in advance of the 2026 recreational fishing season to the best of our ability.

This is especially important as Florida's EFP, and other SA states EFPs, will influence potential future management amendments to transfer management to SA states permanently, just as was done in the Gulf of America under Secretary Ross.

Therefore, we respectfully request flexibility in the initial phase-in of these EFPs and believe that our proposed project aligns with President Trump's directive to use EFPs to promote fishing opportunities in the "Restoring American Seafood Competitiveness" Executive Order. Thank you for making these EFPs a priority and we look forward to the rapid approval so Florida can implement our long-awaited state-led season later this year.

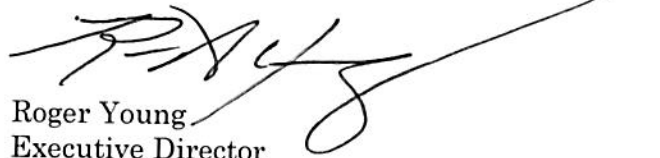
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<sup>1</sup> Topping, T.S., Streich, M.K., Fisher, M.R., and Stunz, G.W., 2019. A comparison of private recreational fishing harvest and effort for Gulf of Mexico red Snapper during derby and extended federal Seasons and implications for future management. *North American Journal of Fisheries Management* 39: 1311-1320.

January 23, 2026

Secretary Lutnick, since you were sworn in, the Department of Commerce has consistently put anglers first, including by rejecting the Biden Administration's last-ditch attempt to force sweeping closures off Florida's Atlantic coast—a move that forged a path to reversing decades of failed federal control and to empower state-led management. We stand ready and are committed to ensuring these EFPs remain a priority to rapid approval so Florida can lead and our anglers can enjoy their natural resources in a responsible, sustainable, and practical way.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Young', with a long, sweeping horizontal line extending to the right.

Roger Young  
Executive Director

Board of Directors, Center for Sportfishing Policy  
Cody Farrill, Deputy Chief of Staff, Governor Ron DeSantis  
Jessica McCawley, Director of Marine Fisheries Management, FWC  
Eugenio Piñeiro Soler, Assistant Administrator for Fisheries, NOAA

**Attachments**

**Request for an Exempted Fishing Permit for Management of the Private  
Recreational and For-Hire Components of the Red Snapper Recreational Fishery  
Off Florida's Atlantic Coast for 2026-2028**



**i. Application date:** January 23, 2026

**ii. EFP duration:** May 1, 2026 – December 31, 2028

**iii. Applicant's name, mailing address, and telephone number**

Florida Fish and Wildlife Conservation Commission  
1875 Orange Avenue East  
Tallahassee, FL 32311  
Phone: (850) 487-0554

**iv. Points of contact**

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## **v. Background**

Atlantic red snapper is an economically-important and iconic fishery in Florida's waters. However, the fishery has also been plagued by management challenges due to a lack of precise and reliable recreational landings, effort, and discard data. Past stock assessments have indicated that the stock is overfished and undergoing overfishing; however, these assessments also highlighted that abundance and biomass had increased and reached an all-time high in the most recent years of the assessment (SEDAR41, 2017; SEDAR73, 2021). Anglers have seen this record abundance on the water and have been frustrated by the lack of access and the management process. As frustration mounted, NOAA Fisheries conducted a stock assessment update (SEDAR73 Update, 2024), which highlighted that the stock is no longer overfished, and following implementation of NOAA's Secretarial Amendment 59 is no longer undergoing overfishing, and is rebuilding 20 years ahead of schedule. Despite this positive news, extremely low quotas, driven by highly uncertain dead discard estimates, have resulted in short 1-2-day recreational fishing seasons. These short fishing seasons directly contribute to highly inaccurate data used to monitor and manage Atlantic red snapper (i.e., MRIP-FES), as evidenced by PSE's that are routinely higher than 50%. However, because MRIP is considered the Best Scientific Information Available (BSIA), NOAA Fisheries uses this inaccurate data to justify extreme access restrictions. More frustrating is that NOAA's own policy states that MRIP data with a PSE above 50% should not be used for management purposes, yet NOAA Fisheries uses exactly those data for Atlantic red snapper. To further highlight the challenges with MRIP, NOAA Fisheries also admits that MRIP-FES may overestimate recreational fishing effort and harvest by up to 40% and that dead discards, which NOAA previously stated should not be used for management purposes due to high PSEs, represent the main reason for a small quota and short fishing seasons. Clearly, the data being used to manage and monitor Atlantic red snapper (i.e., MRIP-FES) represents the crux of the issue.

Beyond the foundational shortcomings of MRIP-FES, the data being used for management are heavily influenced by the extremely short season structure determined by NOAA Fisheries. Research has shown that effort estimates, and therefore estimates of harvest and discards, were artificially inflated across short fishing seasons for Gulf red snapper (Powers and Anson, 2018; Topping et al., 2019). As Gulf states were allowed to test state management for the private recreational anglers across longer fishing seasons, the data collected by the states became more precise than MRIP-FES, and therefore, was considered the BSIA to manage the Gulf red snapper private recreational sector. A similar situation is currently unfolding for Atlantic red snapper, with consistent 1-2-day recreational fishing seasons established by NOAA Fisheries and incredibly high levels of effort estimated by MRIP-FES. MRIP was never meant for in-season fisheries management, and there is a clear need for essential, baseline data on landings, effort, and discards of Atlantic red snapper to better inform the management of this popular fishery. Furthermore, these short open seasons force a derby-style fishery, where anglers rush to fish to maximize catch before the brief window closes. This effort compression creates unsafe conditions at sea, overall encourages overconcentration of effort, and reduces both safety and fishery quality. Collectively, the United States Coast Guard, NOAA Law Enforcement, and individual state-agency law enforcement agencies have cautioned against these "derby" seasons due to the unsafe and unsustainable fishing conditions.

## **vi. Purposes and goals of the exempted fishery for which an EFP is needed, including justification for issuance of the EFP**

The purpose of this EFP is to allow the Florida Fish and Wildlife Conservation Commission (FWC) to conduct a pilot study during 2026-2028 to test two methods for use in recreational data collection and catch, effort, and discard monitoring. These methodologies could then be potentially applied by the State of Florida for management of the private recreational and

licensed for-hire components (state and federal) within the red snapper fishery off Florida's Atlantic coast in state and federal waters: (1) Florida's State Reef Fish Survey (SRFS) and (2) a voluntary smartphone web-based application during trips where a red snapper is harvested. Throughout this application, 'for-hire' refers to for-hire trips run from vessels that either hold a state-licensed charter permit or a federal South Atlantic Charter/Headboat for Snapper-Grouper For-Hire Fishing Permit. This EFP is offered in cooperation with the other South Atlantic states of Georgia, South Carolina, and North Carolina.

To accomplish the proposed pilot study, FWC aims to accomplish the following goals:

- 1) Develop an app to record information from participants;
- 2) Directly collaborate with the recreational sector and collect catch, effort, and discard information within the snapper grouper fishery;
- 3) Create a permit for state-licensed for-hire operations that enables participation in the pilot study once operator is registered;
- 4) Understand angler behavior as well as catch, effort, and discard rates throughout the year to develop in-season landings prediction model to inform future fishing seasons.
- 5) Coordinate with other South Atlantic states and NOAA Fisheries to determine projected landings estimates for year 2 based on data collected during year 1.

As noted above, short fishing seasons that drive an artificially compressed level of fishing effort, and therefore a lack of reliable catch and discard information, have compounded management of the Atlantic red snapper fishery into an untenable situation. To gather baseline data that is reflective of catch, effort, and discard rates associated with an expanded fishing season, FWC is proposing to monitor the recreational red snapper fishery through an extended 2026 fishing season that runs continuously from May 22 (the Friday before Memorial Day) to June 20 and reopens in the fall for 3-day fishing weekends (Friday-Sunday) on Oct. 2-4, 9-11, and 16-18. Due to the issues listed above regarding the need for baseline data based on the lack of accurate data currently being used to manage Atlantic red snapper, FWC will not submit projected landings estimates for year 1, as any such estimate would be highly uncertain and not scientifically defensible. The proposed 2026 fishing season was determined after consideration of a number of variables, including but not limited to SRFS catch and effort data, biological and ecological data, overlap with Florida's Gulf red snapper season, angler preferences, etc. The month of May was selected based on feedback from public workshops where many sought to avoid fishing in the peak of spawning season and wanted to overlap with the start of the Gulf red snapper season. Fishing the Florida South Atlantic red snapper season over some of the same days as the Gulf red snapper season was discussed at FWC public workshops and is considered as a way to further limit fishing effort coming from the Gulf coast over to the Atlantic coast of Florida. The three fall weekends in October were also suggested at FWC public workshops as a preferred fishing time and will also overlap with Gulf red snapper fall weekends, further limiting effort for Atlantic red snapper, as anglers will likely not travel from the Gulf to the Atlantic if both are open. In addition, Florida's information about Gulf red snapper season indicates that not all fishing days are created equal. Weekdays have a different effort than weekends, and spring/summer weekdays and weekends are different than fall weekends. Thus, Florida's EFP is considering a combination of types of days in order to gather baseline effort data for a future model and to test the assumptions about how effort varies on spring/summer weekdays versus spring/summer weekends versus fall weekends. Baseline data from year 1 would be used to estimate landings projections for future years and inform specific season structures for 2027-2028. This model is already used in the Gulf and FWC would similarly work with NOAA Fisheries regarding any changes to be implemented in the South Atlantic.

Anglers and licensed for-hire captains participating in the pilot study will catch and/or harvest red snapper (*Lutjanus campechanus*) off Florida's Atlantic coast and use two methods

to report relevant information regarding their fishing trips: (1) the mandatory State Reef Fish Survey (SRFS) and (2) a voluntary smartphone web-based application during trips where a red snapper is harvested. Although anglers fishing for red snapper will be encouraged to report their catch/harvest through the app (to help FWC test its feasibility for use as a future recreational fisheries data collection method), the primary method for monitoring red snapper landings will be the SRFS survey (see Appendix 1 attached to this request for a more detailed description of the procedures, methodologies, and statistical approaches used by SRFS). Under this EFP, the FWC will test the feasibility of the app as a future recreational data collection method and for use in comparisons to SRFS data. Reporting through the app will be voluntary for individual anglers and licensed for-hire captains (state and federal) to report harvest and discards of red snapper within 24 hours of completing their fishing trip. The mandatory SRFS that is currently being used to supplement reef fish recreational fisheries data collected through MRIP will be used to estimate year-round red snapper landings, fishing effort, and discards by private anglers, and a new registration requirement to facilitate surveys will be established for state-licensed for-hire captains participating in the pilot study covered by this EFP.

Private anglers with a valid recreational fishing license (or otherwise exempt) and a valid SRFS endorsement would be allowed to fish and harvest red snapper in the South Atlantic off Florida from shore up to 200 nautical miles (i.e., out to the Exclusive Economic Zone (EEZ) boundary) during the specified Florida Special Red Snapper Fishing Season authorized under this EFP. State-licensed for-hire captains would be allowed to participate in the pilot study and fish for red snapper in state waters only (from shore out to 3 nautical miles), since they are not permitted to fish in federal waters. Federally-licensed for-hire boat captains with a South Atlantic Snapper-Grouper Charter/Headboat permit would be allowed to participate in the pilot study and fish from shore up to 200 nautical miles. All participants would be required to launch and return their vessels from Florida. For the purposes of estimating state-for-hire and federal-for-hire harvest of red snapper through this pilot program, all captains who would like to take customers fishing for red snapper would be required to sign up for the pilot study covered by this EFP. These captains, when surveyed through the For-Hire Survey for MRIP, would report on behalf of their customers. An additional sample of state and federal for-hire captains may be selected during the Florida Special Red Snapper Fishing Season to ensure adequate sample sizes for effort estimates. FWC regularly coordinates with NOAA staff regarding MRIP sample draws to ensure an adequate number of samples are conducted and the proposed Atlantic red snapper fishing season in this proposal is no different. State-licensed captains who do not run red snapper or snapper grouper trips in the South Atlantic would not be required to sign up for the pilot study and would be prohibited from keeping red snapper under this EFP.

Private anglers and for-hire captains who participate in the Florida Special Red Snapper Season will be required to fish for a 10-fish snapper grouper aggregate bag limit (detailed below). Once each private angler or each customer on a for-hire vessel fills the 10-fish snapper grouper aggregate bag limit, they will be required to stop bottom fishing for reef fish (i.e., 55 species within the South Atlantic snapper-grouper complex). Participants may target other species such as coastal migratory pelagics, dolphinfish, snook, red drum, etc., but they will not be allowed to bottom fish for reef fish for the remainder of the trip; thereby minimizing their interaction with snapper grouper species and reducing discard mortality. Species within the 10-fish snapper grouper aggregate must meet current federal regulations (season and size limits); excluding red snapper. The expected outcome from such a management strategy would be a reduction in discards across many snapper grouper species, including red snapper.

The 10-fish snapper-grouper aggregate proposed by FWC is as follows:

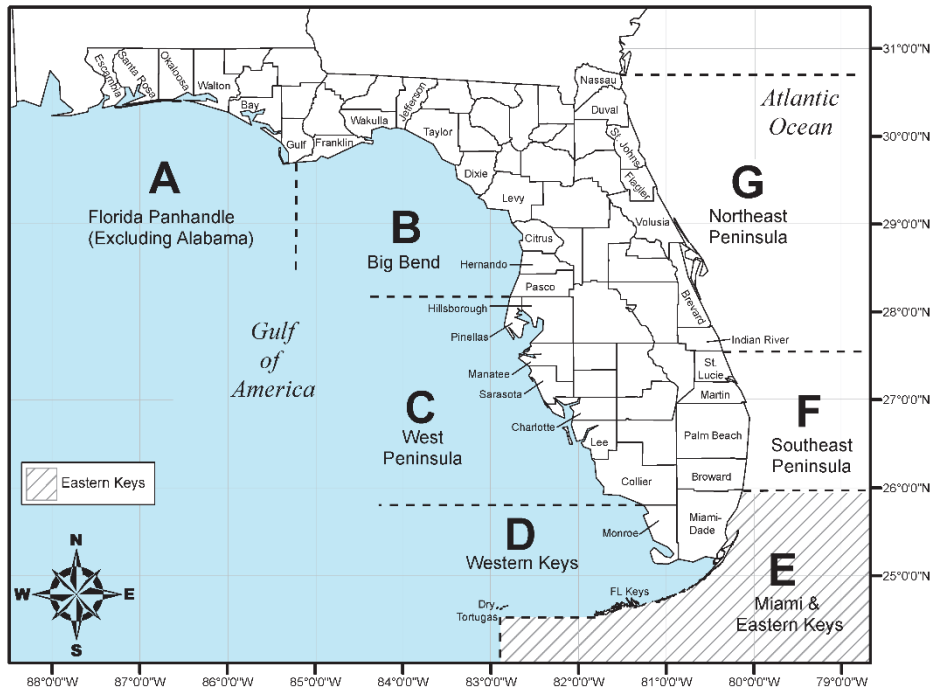
- Only 1 fish can be a red snapper
- Only 1 fish can be a gag, black, or scamp grouper

- Up to 2 fish can be red, yellowfin, yellowmouth, coney, graysby, red hind, or rock hind grouper
- Only 1 fish can be a red porgy, blueline tilefish, or golden tilefish
- Only 1 fish can be greater amberjack
- Up to 2 fish can be black sea bass
- Up to 5 fish can be gray triggerfish
- Up to 7 fish can be schoolmaster, gray, lane, yellowtail, queen, silk, or blackfin snapper
- Up to 5 fish can be vermilion, cubera, or mutton snapper

To ensure the effectiveness of the aggregate bag limit, FWC will implement a targeted outreach plan to inform anglers of changes to the species included in the bag limit, thereby reducing confusion and increasing compliance. This targeted outreach will change throughout the year as fishing seasons for some snapper-grouper species (e.g., gag grouper, blueline tilefish) would be open during the first portion of the proposed split season, but not during the fall season. FWC is well-positioned to educate the public on this strategy, as the aggregate bag limit was previously tested as an innovative management strategy under the FWC Atlantic EFP Project (2024–2026), and outreach materials have already been developed. Planned outreach tools could include a dedicated state management website, an explanatory video on the aggregate bag limit, regular press releases, targeted emails to SRFS permit holders, and additional materials for public dissemination. In addition, FWC managers will closely coordinate with FWC phone staff, field biologists, and law enforcement to ensure all parties are fully informed of the project, with particular emphasis on the aggregate bag limit.

The reporting app developed by FWC and used during FWC’s Atlantic Red Snapper EFP research projects has been an effective means of obtaining large amounts of fishing data (e.g., catch, discards, weather, location and depth fished, etc.). This app will be expanded to be open access, and individual private anglers will be able to use the app to report their personal catch and other relevant information. Individual names and other information needed to identify individual anglers would be collected using the app and could be matched to SRFS data. In contrast, state-licensed and federally-licensed for-hire captains would report on behalf of all customers fishing for red snapper aboard their vessel. Red snapper information collected through the app will include:

- Trip declaration,
- Date of fishing trip,
- Time fished,
- General location of fishing trip using SRFS map,



- What percentage of time was spent fishing in federal waters in the Atlantic (more than 3 miles from shore) for reef fish,
- Number of red snapper harvested,
- Number of red snapper released (and condition upon release), and
- Additional information (e.g., shark depredation, did not fish/trip cancellation due to weather)

Prior to fishing, anglers and captains will be asked to declare their intent to go fishing within the FWC app. After the conclusion of their fishing trip, anglers will be instructed to report the number of red snapper released and/or harvested as zero if they went on a red snapper trip but failed to catch any red snapper. Anglers and captains could also report if their trip was cancelled and why (e.g., weather). As mentioned, all of this would need to be reported within 24 hours of completing their fishing trip or expected trip. Reminders can be set up through the FWC app to remind anglers and captains to report their data. Although anglers fishing for red snapper will voluntarily report their catch/harvest through the app (to help FWC test its feasibility for use as a future recreational fisheries data collection method), the primary method for monitoring red snapper landings will be the SRFS survey (see Appendix 1 attached to this request for a more detailed description of the procedures, methodologies, and statistical approaches used by SRFS).

SRFS is a specialized survey designed to supplement the MRIP survey to provide more precise catch estimates for the recreational private boat fishery targeting reef fishes off Florida. Anglers fishing from private boats are required to sign up annually for the free SRFS designation to legally retain select reef fish species. Subscribers serve as the sample universe for a monthly mail survey to estimate fishing effort. Catch data is collected through targeted dockside surveys of offshore private recreational fisheries. A comprehensive list of recreational

fishing access points is currently maintained by FWC and used for the access point intercept survey portion of the MRIP. This site register is used to identify a subset of sites throughout the east and west coasts of Florida where private recreational boats return from offshore fishing trips. Offshore private boat fishing sites are selected for supplemental assignments (i.e., additional to MRIP assignments) using valid statistical sampling approaches. SRFS is MRIP certified and is being used for management and stock assessments, rather than MRIP-FES, for numerous reef fish fisheries in the Gulf of America and South Atlantic (e.g., mutton snapper, yellowtail snapper, Gulf gag grouper, Gulf red grouper). Additionally, through the ongoing Atlantic red snapper stock assessment process for SEDAR 90, estimates provided by SRFS on catch, effort, and discards have been shown to be four times smaller, 1.2 times smaller, and 2.1 times smaller than MRIP-FES estimates, respectively (Ramsay, 2025). More importantly, variance estimates for SRFS catch, effort, and discards are 80 times smaller, 10.9 times smaller, and 9.6 times smaller than MRIP-FES, respectively. It is clear that SRFS is well-equipped to monitor the Atlantic red snapper fishery for use in management and further explore how these data change and become more precise with an expanded fishing season, compared to the current framework under MRIP.

As explained above, red snapper landings and discards by Florida state-licensed and federally-licensed for-hire captains who elect to fish for red snapper during 2026-2028 (the period covered by this EFP) will be estimated through the MRIP For-Hire Survey. An additional sample of state and federal for-hire operations may be selected during the Florida Special Red Snapper Season to ensure adequate sample sizes for effort estimates. FWC will work with MRIP to adjust draws and assignments to better account for these seasons, concentrating sampling efforts on red snapper. The duration of the Special Red Snapper Fishing Season is based on several factors, including projected landings for the private recreational and for-hire components of Florida's red snapper fishery (excluding dead discards), results from the South Atlantic Red Snapper Research Project indicating that the population may be 2.7 times higher than previously estimated, and the need to collect baseline recreational data that is better suited for in-season fisheries management than MRIP. Similar to the way FWC manages the Gulf red snapper fishery, Atlantic red snapper will be closely monitored (SRFS, MRIP, and FWC's app).

In-season quota monitoring for future seasons will be based on an in-season projection model like what FWC uses for Gulf red snapper. In the Gulf, this model uses continuously updated historical catch and effort data. The model is refined annually and has demonstrated a strong track record of producing accurate estimates of recreational harvest, thereby minimizing the risk of quota overruns. The first year of the EFP in the South Atlantic will serve as a pilot phase to characterize actual landings during a constrained recreational season. In subsequent years, an in-season prediction model will be developed for South Atlantic red snapper similarly to how models were developed for in-season quota monitoring for Gulf red snapper developed by FWC and Gulf gag grouper developed by FWC in coordination with USF (Hyman et al. 2026). These models explore predictors like season length, season start date, fishable weather days, the number of dockside intercepts, and historical effort to best determine how to predict landings. Historic landings data from the specialized ECRS survey and historic catch information from SRFS will also be used to help inform the model.

The FWC has a long history of working collaboratively with NOAA Fisheries' Office of Science and Technology (OS&T). FWC's SRFS is the result of a decade of development and testing in Florida, in collaboration with independent statistical consultants and OS&T. In 2018, the survey design and estimation methods were peer-reviewed and subsequently certified by NOAA Fisheries as statistically valid and suitable for use (SRFS Certification Memo and design documentation, available online: <https://www.fisheries.noaa.gov/recreational-fishing-data/transitioning-new-recreational-fishing-sur...>). This peer review was conducted for the survey when it was conducted only in the Gulf. In 2020, this survey was expanded to include the Atlantic. After consultation with NOAA OS&T, an additional review of the survey design was

determined to be unnecessary due to no major changes in the statistical and survey design with the spatial expansion (pers comm Richard Cody, NMFS OS&T). While the SRFS and MRIP surveys use independent methods to estimate fishing effort, FWC routinely collaborates with OS&T for assignments for intercept surveys to ensure sample weights are compatible (Foster, 2018). Moving forward, FWC will continue to work collaboratively with OS&T if determined that any potential changes to SRFS methodology are necessary.

Past research, as well as experience in managing red snapper in the Gulf of America, has highlighted that extended fishing seasons result in a reduction of fishing effort (Powers and Anson, 2018; Topping et al., 2019). Conversely, short fishing seasons, such as the current 1–2-day federal Atlantic red snapper fishing season, have been shown to compress effort into a derby-style season. While it is counterintuitive that a shortened season can have more detrimental impacts on a fishery than an extended season, research has demonstrated this to be the case in other fisheries, including Gulf red snapper (Powers and Anson, 2018). The Topping et al paper noted that increasing the number of days of the private recreational red snapper season reduced fishing effort by more than 60%. By extending the season, the artificially inflated harvest rate, which is due to effort compression, would be reduced, allowing anglers to have additional fishing days. Florida is uniquely set up in the South Atlantic to test whether an extended fishing season, combined with a snapper-grouper aggregate bag limit, would reduce and spread-out recreational fishing effort and landings. As such, Florida is proposing to set a continuous 30-day fishing season in the spring or early summer (outside of peak spawning for Atlantic red snapper) and a separate 9-day season in the fall. Florida's SRFS, MRIP, and the FWC app would be used to track landings, effort, and discards. If this EFP is approved by NOAA Fisheries, FWC could modify dockside sampling efforts to accommodate for an expanded Atlantic red snapper season structure.

**vii. List of the specific regulations from which an exemption is being requested and why each exemption is required for the experiment to succeed.**

As highlighted above, all private anglers with a SRFS designation and for-hire captains (state and federally-permitted) who sign up for the EFP with the new state Atlantic red snapper for-hire permit will be able to participate in the Florida Special Red Snapper Season. During the Florida Special Red Snapper Season, anglers will be able to retain 1 red snapper per person per day and for-hire captains who sign up for an EFP would be allowed to have their customers harvest 1 red snapper per person per trip. Captain and crew on for-hire trips would not be permitted to harvest a red snapper recreational bag limit. Private anglers and for-hire customers will be required to stop bottom fishing for reef fish once they have reached their 10-fish snapper grouper aggregate bag limit. FWC would provide lists of documentation and contact information for these anglers and for-hire captains to NOAA Fisheries (through the mandatory SRFS registry and from the list of licensed for-hire captains who sign up for the pilot study).

For 2026, the Florida Special Red Snapper Season will run from May 22-June 20 and select 3-day weekends in October (Oct. 2-4, 9-11, 16-18). A longer recreational fishing season than the current 1-2-day season is required to evaluate whether catch, effort, and discard rates are reduced as the fishing season expands. Evidence suggests the Atlantic red snapper stock is healthier than it has been in decades, is 20 years ahead of the rebuilding schedule, and potentially 2.7 times more abundant than previously estimated. FWC believes that there is ample biological, ecological, social, and economic justification to allow for the below exemptions to support improved data collection and management of Atlantic red snapper. FWC's past experience in Gulf red snapper state management and research from Powers and Anson (2018) and Topping et al. (2019), highlighting the artificial inflation of fishing effort due to short seasons, further justifies the need to gather data and manage Atlantic red snapper differently than the status quo. Additionally, FWC intends to overlap the start date, continuous season, and fall

weekends of the Florida Special Red Snapper Season in the Atlantic with Florida's private recreational red snapper season in the Gulf of America to reduce effort shifting from the Gulf into the Atlantic, reducing overall pressure on the Atlantic fishery.

As a reminder, FWC is currently in Year 2 of three separate Atlantic Red Snapper EFP research projects aimed at reducing discards and is in a unique position to implement management strategies based on the findings from this research. To this point, implementation of a 10-fish snapper grouper aggregate bag limit is expected to further reduce landings, effort, and discards of Atlantic red snapper and other snapper grouper species.

To accomplish the goals of testing Atlantic red snapper data collection across an extended recreational Atlantic red snapper fishing season and a 10-fish snapper grouper aggregate bag limit, the following regulations would need to be exempt, including:

- Recreational season closure for red snapper at 50 CFR §622.183(b)(5)(i)
- Annual catch limits and accountability measures for red snapper at 50 CFR §622.193(y)(2)
- Limited-harvest species - red snapper at 50 CFR §622.181(c)(2)

Additionally, this exempted fishing activity request does not include changes to the existing management measures for the commercial fishery. The data collection issues with the high PSEs are primarily in the recreational fishery and thus, Florida's EFP proposes to focus on the recreational sector of the fishery. This EFP is not intended to affect the existing management measures for the commercial fishery, such as the existing commercial season.

#### **viii. Catch information**

The target species is Atlantic red snapper. Harvest of red snapper outside of the federal season and annual catch limit would require an EFP (see section above). While red snapper is the target species, other species within the South Atlantic snapper-grouper complex may be incidentally caught and harvested while trying to fill the 10-fish snapper-grouper aggregate bag limit. An EFP is not required for the other 54 species in the snapper-grouper complex as participants are required to follow regulatory closures for these species. Additionally, an EFP is not required for the 10-fish snapper grouper aggregate, as species-specific bag limits are set equal to or less than current federal bag limits (see section above). As such, the South Atlantic snapper-grouper complex includes the following harvestable species: greater amberjack, lesser amberjack, Atlantic spadefish, black grouper, coney grouper, gag grouper, graysby grouper, misty grouper, red grouper, red hind grouper, rock hind grouper, scamp grouper, snowy grouper, wreckfish, yellowedge grouper, yellowfin grouper, yellowmouth grouper, cottonwick grunt, margate grunt, sailors choice grunt, tomtate grunt, white grunt, hogfish, almaco jack, bar jack, jolthead pogy, knobbed pogy, longspine pogy, red pogy, saucereye pogy, scup pogy, whitebone pogy, banded rudderfish, bank sea bass, black sea bass, rock sea bass, blackfin snapper, cubera snapper, gray snapper, lane snapper, mutton snapper, queen snapper, red snapper, silk snapper, vermilion snapper, yellowtail snapper, blueline tilefish, golden tilefish, sand tilefish, gray triggerfish, and ocean triggerfish. Within the proposed program and in addition to the snapper-grouper species listed above, anglers would also be able to harvest other species (e.g., Coastal Migratory Pelagics, dolphinfish, etc.) within the current South Atlantic regulatory limits. Should a regulatory closure occur for any species (other than red snapper), participants will be prohibited from harvesting those species. Should new regulations for species in the snapper grouper complex be implemented after submission of this proposal (e.g., a bag limit change), FWC will modify the snapper grouper aggregate to reflect new regulations for those species, as has been done for black sea bass (Regulatory Amendment 37

(pending final action)) in the proposed 10-fish aggregate. Recreational catch and discard information will be captured through SRFS, MRIP, and FWC's app.

No additional environmental impacts are anticipated because of this EFP proposal, including impacts to fisheries, marine mammals, threatened or endangered species, or essential fish habitat. Recreational fishing effort in the region occurs year-round and is not dependent on whether the Atlantic red snapper season is open. Consequently, the actions in this proposal are not expected to result in impacts to target or non-target species beyond existing baseline conditions.

This EFP is consistent with the Magnuson–Stevens Fishery Conservation and Management Act (MSA). EFPs are allowed to be exempt from current catch limits, and the Atlantic red snapper stock is not at risk of overfishing. This EFP is designed to support science-based management by improving recreational fishing data collection for Atlantic red snapper, thereby enhancing the stock's sustainability and optimizing yield within the fishery. Fishing effort off Florida for snapper grouper species occurs year-round. As such, the proposed EFP is not expected to increase effort and poses no more of a risk to the Atlantic red snapper stock than current levels of effort estimated by NOAA. Given that fishing effort is not expected to increase, an overall increase in fishing mortality beyond current levels is also not expected. As a result, the proposed EFP complies with the MSA to ensure that overfishing does not occur and that stock rebuilding goals are not undermined (National Standard 1).

As highlighted throughout this application, past research has shown that as fishing seasons expand, catch rates, effort, and discards are comparatively reduced. The EFP is designed to collect targeted scientific data (e.g., catch, effort, discards) that improves our understanding of recreational fisheries during short-duration seasons—information that is not adequately captured by existing survey programs, directly supporting the MSA requirement to base management decisions on the best scientific information available (National Standard 2). Lastly, because the EFP occurs within existing recreational fishing practices, it is not expected to increase bycatch mortality of non-target species (National Standard 9). As such, FWC believes that these EFPs will simultaneously reduce dead discards and improve recreational data collection, consistent with BSIA, such that this fishery is sustainably managed.

Ultimately, by posing low risk to the Atlantic red snapper stock and operating within existing regulatory frameworks, this EFP meets the MSA's objectives of preventing overfishing, ensuring sustainable fisheries, and providing improved data for science-based management while taking advantage of the Act's explicit authority to authorize limited experimental research.

#### **ix. Effort information**

Private anglers with a valid SRFS designation will be allowed to participate in the Florida Special Red Snapper Season. For-hire captains (state-licensed and federally-licensed) would be required to sign up for the EFP to enable their customers to participate in Florida's Special Red Snapper Season. Additionally, the trip declaration requirement within the voluntary FWC app will provide additional insight into intended and actual fishing effort during the Florida Special Red Snapper Season. All anglers would be required to stop bottom fishing for snapper grouper species once their 10-fish snapper grouper aggregate bag limit is reached. Harvest of red snapper is allowed by spearfishing or hook-and-line. If using hook-and-line, anglers are required to fish with a single-hook rig. Anglers would be required to have a descending device or venting tool rigged and ready and must use the descending device or venting tool if a fish is experiencing barotrauma. Harvest of Atlantic red snapper off Florida's east coast will only be allowed to occur during Florida's Special Red Snapper Season, May 22-June 20 and select 3-day weekends in October, and eligible anglers would be allowed to harvest 1 red snapper per day with no minimum size limit.

**x. Information for vessels to be used for the EFP as soon as the information is available and before operations begin under the EFP**

FWC will require all private recreational anglers participating in the Florida Special Red Snapper Season to hold a valid saltwater recreational fishing license issued by the State of Florida (or are exempt) and have declared themselves a SRFS angler (no-cost, annual designation). FWC will also require state-licensed for-hire and federally-licensed for-hire captains participating in the season to sign up for the State Atlantic Red Snapper For-Hire permit. All federally-licensed for-hire operations participating in the season will need to have the appropriate federal permits. Therefore, FWC will be able to account for and provide NOAA Fisheries and Law Enforcement with a list of participants (e.g., state license, registration of each vessel and vessel name during designated fishing trips, name of participants and contact information, etc.) to be covered under the EFP as soon as the information is available and before operations begin under the EFP.

**xi. Supporting Information**

FWC is currently in Year 2 of the three separate FWC Atlantic Research EFP Projects, funded through a separate Request for Proposals from NOAA, to test innovative recreational management strategies aimed at reducing dead discards of snapper grouper species and provide additional red snapper harvest opportunities. The dates for Year 2 of this project are September 2025 through August 2026. As such, FWC's proposed 2026 red snapper season outlined in this EFP proposal would slightly overlap with the three FWC Atlantic Research EFP Projects in May and June of 2026. It is FWC's intent to run the FWC Atlantic Research EFP Projects until we have confirmation of the state management EFP approval and confirmed 2026 season. FWC has the capability to run both programs simultaneously but is willing to coordinate with NOAA on whether to stop the three FWC Atlantic Research EFP Projects early. Additionally, in Year 1 of the FWC Atlantic Research EFP Project, only 5,615 fish were harvested of the 11,760 requested. For Year 2 of the Project, we requested 12,384 fish to be harvested, and only 1,653 fish have been harvested during the first quarter (September to November 2025). We anticipate that harvest for the remainder of Year 2 will be significantly under the requested quota.

As noted previously, this EFP was developed in coordination with the other South Atlantic states of Georgia, South Carolina, and North Carolina. To ensure that the scientific information collected through these EFPs meaningfully informs management and research efforts, continued coordination and cooperation among the states is essential. Moving forward, FWC is committed to regular engagement with South Atlantic state partners to coordinate data collection and sampling efforts to maximize the value and utility of data collected through the EFPs. In addition, FWC managers and scientists are prepared to work closely with their counterparts to ensure all information contributes to the best scientific information available.

Since 2012, FWC has conducted a specialized East Coast Red Snapper (ECRS) survey to provide more precise and timely estimates of red snapper fishing effort and catch during the recreational mini-seasons in the South Atlantic (Ramsay and Corbett 2025). Florida's SRFS generates estimates at monthly time scales and is not designed to produce accurate catch estimates for seasons shorter than one month. Therefore, the ECRS survey is used to estimate landings and releases for the private recreational and charter fleets during South Atlantic red snapper mini-seasons. During each mini-season, FWC biologists collect data from recreational anglers returning from fishing trips at approximately eight inlets along Florida's east coast. Biologists conduct angler interviews, record catch information, collect biological samples, and conduct inlet boat counts. Data from this targeted mini-season sampling are used to generate landings estimates for the corresponding MRIP wave.

Under this EFP proposal, FWC recommends implementing a 39-day split recreational red snapper season in lieu of the short mini-seasons that have hindered adequate management over the past decade. The extended season structure reduces the need for a specialized, event-based survey approach. As a result, FWC would no longer rely on the East Coast Red Snapper (ECRS) survey in its current form and would instead utilize the State Reef Fish Survey (SRFS) to monitor recreational catch and effort on a continuous, year-round basis. To ensure data quality, FWC staff are actively evaluating sampling design enhancements, including increased sampling coverage during the opening weekend, to achieve adequate sample sizes and maintain robust estimates.

#### **xii. Coordination with the other South Atlantic states**

All South Atlantic states have coordinated continuously throughout this process on the methodology used in these EFPs. State agency staff from the four states will meet at least bi-weekly to discuss any challenges as the EFPs are occurring and how each state is working to resolve those challenges. States will try and have as similar a response as possible to any challenges that occur during the EFPs and continually learn from the experiences of the other states. At the end of year 1 of the EFPs, the state agency staff will meet at least once for an all-day, in-person meeting to discuss lessons learned and what should be changed for year 2. These discussions will ensure the data collected are as similar as possible, enabling a direct comparison of effort, landings, and angler behavior across the region. Any differences will be discussed and changes made (if possible) within each states' authority to ensure similarity across experiments and useable data for the future. Following the annual state agency meeting, a meeting will also be held at the end of year 1 with NOAA Fisheries and the states about how year 1 went, including what challenges were encountered, and how the states propose to modify their EFPs for year 2. These annual meetings are an accountability measure to fix any problems encountered before year 2 begins. As referenced throughout this proposal, Florida will utilize an in-season projection model based on data collected from year 1 of the EFP to inform future fishing season structures. Results from this model will be presented to the other states and NOAA Fisheries. Any modifications to EFPs will be submitted by all of the states for subsequent years as changes are made to the methodology.

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#### ix. Signature of applicants



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#### x. Appendices

##### Appendix 1: Florida's State Reef Fish Survey (SRFS): A Brief Summary

###### Background

In response to the need for more precise estimates of recreational catch for reef fishes, particularly from private boats, the Florida Fish and Wildlife Conservation Commission developed and implemented a new year-round survey in 2020 that runs side-by-side with the historic Marine Recreational Information Program (MRIP). The MRIP is a general survey of all saltwater recreational fishing in both state and federal waters, whereas the State Reef Fish Survey (SRFS) is a supplemental, more specialized survey that directly targets participants in the reef fish fishery to collect information on effort and catch. The SRFS is the result of a decade of development and testing in Florida, in collaboration with independent statistical consultants and NOAA Fisheries scientists. The survey provides year-round, monthly estimates of fishing effort, landings, and discards for a suite of reef fish species commonly targeted by recreational anglers fishing from private boats in Florida. That species suite includes Gag (*Mycteroperca microlepis*), Black Grouper (*M. bonaci*), Red Grouper (*Epinephelus morio*), Gray Triggerfish (*Balistes capriscus*), Red Snapper (*Lutjanus campechanus*), Mutton Snapper (*L. analis*), Vermilion Snapper (*Rhomboplites aurorubens*), Yellowtail Snapper (*Ocyurus chrysurus*), Amberjacks (*Seriola* spp.; Greater/Lesser, Almaco Jacks, Banded Rudderfish), and Hogfish

(*Lachnolaimus maximus*). These species were selected based on their management priority due to high recreational interest and economic importance or the need for improved, species-specific data to support more accurate stock assessments and harvest opportunities. These species are commonly targeted by anglers and contribute significantly to Florida's coastal economy.

Initially named the Gulf Reef Fish Survey (GRFS), the methodology was implemented in May 2015 and was only conducted on the west coast of Florida, north of Monroe County (Fig. 1) for 10 species. In 2018, the survey design and estimation methods were peer-reviewed and subsequently certified by NOAA Fisheries as statistically valid and suitable for use (SRFS Certification Memo and design documentation, available online: <https://www.fisheries.noaa.gov/recreational-fishing-data/transitioning-new-recreational-fishing-survey-designs>). In July 2020, the survey was expanded to include Monroe County and the east coast of Florida. Yellowtail Snapper, Mutton Snapper, and Hogfish were added to the species suite at this time as these species have a higher catch frequency in Monroe County and southeast Florida than in the original GRFS regional distribution.

The SRFS runs concurrently with the MRIP survey in Florida, which has provided vital statistics on recreational fishing effort and catch in the Gulf of America and Atlantic Ocean off the coast of Florida since 1981. The SRFS and MRIP surveys use independent methods to estimate fishing effort (angler trips). However, catch estimates derived from each method are not completely independent. To estimate catch-per-unit-effort (CPUE), MRIP uses data collected in the Access Point Angler Intercept Survey (APAIS), and SRFS uses a combination of data from the APAIS and supplemental reef fish angler intercepts. Assignments for both intercept surveys are drawn together so that sample weights are compatible (Foster, 2018). Effort and CPUE estimates are combined to generate catch estimates.

## **SRFS Effort Survey**

### *Overview:*

The SRFS effort survey is a mail survey designed to estimate the total number of private boat fishing trips targeting reef fish within Florida state and federal waters. Sampling occurs monthly and only individuals who hold a State Reef Fish Angler designation are eligible to receive the mail survey. This designation is free and required for all anglers 16 and older (including anglers over 65 that are not required to purchase a Florida Saltwater Fishing License) who target or catch any of the thirteen reef fish species that are part of the SRFS species suite. These data provide the sampling frame for selecting households likely to have engaged in private boat fishing for reef fish. The survey includes questions about the number of trips, trip location, and catch or target species to derive estimates of total effort specific to reef fish trips.

### *Sampling Design:*

A stratified random sampling design is used to ensure representative coverage of anglers across coastal regions and increase estimate precision. The population of individuals with the state reef fish angler designation are stratified by region, separating Florida into coastal and non-coastal counties and three regions by latitude. Out of state anglers are stratified into two regions, geographically close states (Georgia and Alabama) and the rest of the U.S. The Florida regions are further stratified to separate boat-owning households from those who do not. Each month, a sample of 10,000 licensed anglers is drawn from the registry. Sample sizes for each stratification are selected by a Neyman allocation that is rerun every six months to maintain relevancy and selected license holders are mailed a survey questionnaire.

### *Survey Design and Processing:*

Respondents report the number of private boat trips taken within one month, specifying whether those trips targeted reef fish species. The recall period is short to reduce memory bias and improve accuracy. Completed surveys are returned to FWC, and data are processed to remove incomplete or duplicate responses and ensure accuracy. Since the survey uses a design-based method, expansion factors are applied to weight each response according to the inverse probability of selection within its stratum. These weights allow for unbiased expansion of survey responses to total, monthly effort estimates for the population of anglers with the state reef fish survey designation.

## **SRFS Dockside Survey**

### *Overview:*

The SRFS dockside survey supplements MRIP's Access Point Angler Intercept Survey (APAIS) by increasing sampling coverage at offshore sites to intercept more reef fish trips and collect detailed biological data from catch landed by private boat anglers. Sampling occurs at public boat ramps, marinas, and other access points throughout Florida's Gulf and Atlantic coasts.

Interviews are conducted to collect catch information for an entire boat (i.e., inclusive of all the anglers that participated in that trip), rather than for individual anglers, as is done with the APAIS survey. Biologists record trip information, catch composition, and biological samples are taken. These data provide the catch-rate component of total catch estimation and supply biological information essential for stock assessments.

### *Sampling Design:*

Survey sample selection for SRFS is performed by MRIP staff as a supplement to their sample selection for APAIS sites. APAIS sampling occurs at publicly accessible recreational fishing access sites and follows a stratified design. Strata in Florida include coast (Gulf or Atlantic), year, month, day type (weekend/weekday), time of day (3 daytime intervals), and fishing mode (private boat, charter, shore, or offshore). Sampling assignments (site-day-time selections) are generated through probability-based selection proportional to expected angler activity at each site-day-time interval. The expected angler activity and available fishing sites are based on historical data and is frequently updated to reflect changes in fishing pressure.

The SRFS supplemental dockside sampling frame is modified from the APAIS to include only offshore sampling sites, each with an associated measure of expected fishing activity. Assignments are distributed to ensure spatial and temporal coverage across strata, prioritizing locations and times with higher reef fish trip activity. Biologists complete all assigned shifts regardless of expected catch conditions to maintain unbiased representation.

### *Interview Protocol:*

At each assigned site, biologists approach all returning vessels to determine if they were fishing, fishing mode (private or charter), and whether the trip targeted, harvested, or discarded any of the suite of 13 SRFS species. If the boat is private and targeted or caught a SRFS fish, the survey continues to collect detailed trip information. The SRFS does not interview boats from the charter fleet. Biologists record the total number of anglers, trip duration, approximate trip location (state or federal waters), depth fished, and gear type. Biologists also ask and visually verify if anglers fishing for SRFS species have the state reef fish angler designation.

If anglers caught fish, information about the number of released fish of each species and whether the fish were released dead, used as bait, or released alive are also recorded. Biologists also ask if any descending devices or venting tools were used to mitigate barotrauma.

If fish were harvested, biologists examine the landed fish to confirm species identification and number of fish. Fork and maximum total lengths, weight, and gonad identification is collected for every harvested fish that anglers permit. Biological samples, such as otoliths, may be taken according to FWC and NOAA protocols.

*Data Processing and Quality Assurance:*

All field data are entered into an electronic data management system and undergo rigorous quality control. Automated range and logic checks identify potential data entry errors or inconsistencies. Records are verified by two levels of supervisory staff and any corrections are documented in an audit trail. To ensure consistency with MRIP APAIS data, species codes, measurement units, and disposition categories align with MRIP data standards.

**Estimation**

*Effort estimates:*

Monthly effort estimates of the SRFS species suite are produced using weighted expansion of reported trips. The reported trips are first weighted according to the inverse proportion of the number of individuals who responded and the number of individuals who have the state reef fish designation in each sampling strata. A correction is then made for the number of individuals fishing for reef fish who do not have the designation for each coast based on proportions calculated from the dockside interview data. Separate estimates are calculated for the Gulf and Atlantic coasts, which differ in seasonality and species composition. Each monthly estimate represents the total number of private boat reef fish trips within a coast and area fished (state or federal waters). Effort estimates are generated separately for the original GRFS species suite than the three species added with the SRFS expansion (Mutton Snapper, Yellowtail Snapper, and Hogfish) due to differences in spatial distribution in where these two fish groups are caught. Annual totals are produced by summing monthly estimates.

*Catch per unit effort (CPUE) estimates:*

Data from the SRFS dockside survey are combined with APAIS dockside data to generate larger sample sizes of intercepted reef fish. Only APAIS data where an angler caught or targeted a SRFS species are used for SRFS estimates. Dockside data from both surveys have complementary weighting schemes due to the same methods being used for both APAIS and SRFS sample selection. Catch per unit effort (angler trips) estimates are generated for each reef fish species for the Gulf and Atlantic coasts for each month, year, and area fished.

*Catch estimates:*

Effort and CPUE estimates are combined to produce catch estimates by species, coast, area fished and month. Landings and release estimates include total numbers of trips, landings in numbers of fish, landings in pounds of fish (whole weight), releases in numbers of fish, and associated measures of uncertainty. Estimates are generated at a monthly scale, however as SRFS estimates incorporate APAIS sampling and sample weights from MRIP staff, SRFS estimates are available every two months (wave), approximately two weeks after MRIP estimates are released.

**SRFS Data Use (historically to 2025)**

Biological data collected from the SRFS survey both for SRFS species and other species intercepted by SRFS biologists have been used since the inception of the survey in stock assessments to help inform length and age compositions.

SRFS estimates have also been used as private recreational catch estimates for stock assessments of Florida-centric species such as Gulf Gag (SEDAR 72), Gulf Red Grouper

(SEDAR 88), Southeast Mutton Snapper (SEDAR 79), and Southeast Yellowtail Snapper (SEDAR 96). SRFS data is currently in consideration for use for Atlantic Red Snapper (SEDAR 90) and statewide for Hogfish (SEDAR 94).

Since 2018 SRFS estimates have been used in state management of Gulf Red Snapper. Species and regions where SRFS estimates have been used for stock assessments are also managed using SRFS estimates. This means that Gulf Gag and Red Grouper used SRFS data for private recreational management starting in 2024 and Yellowtail and Mutton Snapper in Florida will be using SRFS data for private recreational management starting in 2026.

As a longer time-series of SRFS data is available, it is anticipated that SRFS estimates will be used for assessment and management of more of Florida's reef fish species covered by the SRFS survey. The SRFS represents an ongoing collaboration between FWC and NOAA to enhance data quality, improve precision, and strengthen the scientific foundation for sustainable reef fish management.

## Saltwater Recreational Fishing Survey Map

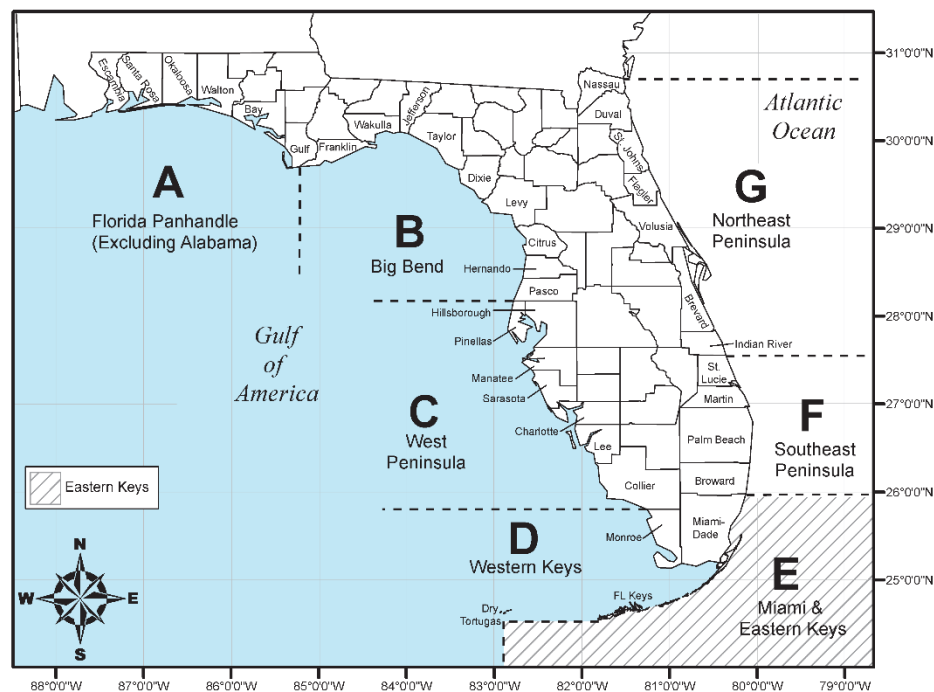


Figure 1. Regions of the state of Florida as designated by the State Reef Fish Survey (SRFS). The Gulf Reef Fish Survey (GRFS) which ran from May 2015-June 2020 covered regions A-C. Expansion to include regions D-G occurred in July 2020 and the species suite was also expanded at this time to include Yellowtail Snapper, Mutton Snapper, and Hogfish.

## Attachment A. FWC Response

We appreciate the opportunity to submit revisions to the exempted fishing permit (EFP) proposal the Florida Fish and Wildlife Conservation Commission (FWC) submitted to NOAA Fisheries on November 10, 2025.

In the January 9, 2026 letter sent to FWC, NOAA Fisheries requested specific data and clarifications outlined in Attachment A. We have updated our EFP to address the request and please find reference to each of the points below.

### Attachment A: Florida EFP Questions.

- Question regarding intent to continue the current FWC Atlantic EFP Project (see Section XI. Supporting Information, page 11)
- Question regarding estimate amount of red snapper harvest expected within EFP (see Section VI. Purpose and Goals, page 3)
- Question regarding plans for in-season quota monitoring (see Section VI. Purpose and Goals, page 7)
- Question regarding how the EFP is consistent with MSA requirements (see Section VIII. Catch Information, pages 10)
- Question regarding any changes to current commercial management (See Section VII. Exemptions, page 9)
- Question regarding how season was determined (see Section VI. Purpose and Goals, page 3)
- Question regarding how additional for-hire surveys will be determined (see Section VI. Purpose and Goals, page 4)
- Question regarding coordination with other states for maximum utility of information gathered (see Section XI. Supporting Information, page 10)
- Question regarding an outreach plan to for the snapper grouper aggregate (see Section VI. Purpose and Goals, page 4)
- Question regarding description of the East Coast Red Snapper Specialized Survey and clarification of whether it will be compared with the State Reef Fish Survey (SRFS) (see Section XI. Supporting Information, page 12)
- Question regarding coordinating with NOAA Fisheries' Office of Science and Technology (see Section VI, Purpose and Goals, pages 7-8)
- Question regarding regulatory exemptions (See Section VII. Exemptions, page 9)