



April 15, 2024

Ms. Adrienne Thomas, PRA Officer
National Oceanic and Atmospheric Administration
Silver Spring, Maryland
20910

RE: OMB Control Number 0648-0551 (89 FR 10042, Document Number 2024-02968)

Dear Ms. Thomas,

Please accept the following comments from the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance) for the National Marine Fisheries Service (NMFS) Southeast Regional Office (SERO) Request For Comment on the proposal to extend the information collection currently approved under OMB Control Number 0648-0551.

The Shareholders' Alliance supports the existing information collections for the Gulf of Mexico individual fishing quota (IFQ) programs. These collections – including data and systems – support real-time tracking and accountability mechanisms that support a successful commercial IFQ management system.

The proposed information collection has practical utility and is necessary for the proper functions of NMFS and commercial IFQ managers. We believe that the estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used, is accurate. At this time, we do not have suggestions on ways to enhance the quality, utility, and clarity of the information to be collected.

We do propose, however, that one way to minimize the reporting burden on those who are to respond would be to implement the commercial electronic logbook program approved by the Gulf of Mexico Fishery Management Council and formally transfer this fishery away from paper logbook reporting. We ask that the Southeast Fisheries Science Center and SERO continue to work with the commercial fishing industry to allow us to pilot test this software as soon as possible in 2024. Doing so will support a rapid implementation transition and will help commercial fishermen familiarize themselves with this program prior to its requirement.

Thank you for the opportunity to comment.

Sincerely,

Eric Brazer
Deputy Director, Gulf of Mexico Reef Fish Shareholders' Alliance