

The Florida Coastal and Ocean Coalition

Caribbean Conservation Corporation & Sea Turtle Survival League •
Reef Relief • Gulf Restoration Network • Natural Resources Defense Council •
The Surfrider Foundation • The Ocean Conservancy • Environmental Defense

Mr. Rodney Barreto, Chairman
Florida Fish & Wildlife
Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399-1600

February 4, 2008

Dear Chairman Barreto:

We are writing today representing hundreds of thousands of Floridians, and many more citizens throughout the region and nation, that believe a healthy and sustainable red snapper population in the Gulf of Mexico is not only good for the future of our state fisheries, but the ecology and economy of the region as a whole. We ask that you and the Commission approve staff recommendations and pass a final rule at your February 7 meeting to adopt compatible state regulations with the federal plan that will bring about an end to overfishing of this important Gulf reef-fish resource.

Florida is a key player in the success of the federal plan and recovery of the fishery. Consistent regulations for red snapper in our state waters (out nine miles), where a significant portion of this fishery is landed, is necessary for recovery plans to be effective. Without these compatible state regulations in open waters of the Gulf, fishing will be confusing, enforcement will be difficult, and more restrictions may be necessary to meet the federal rebuilding plan goals.

Red snapper, our signature reef-fish in the Gulf of Mexico, was first identified as overfished in 1988. Continued unsustainable catch rates and high bycatch levels have created overfishing over the past decade, resulting in a spawning population of red snapper at less than three percent of historic abundance. This mismanagement has not only harmed the Gulf ecosystem by diminishing the role red snapper plays on the reefs and rocky areas of the Gulf, but has also cost the region economically through foregone yields and overcapitalization associated with unsustainably managed fish populations.

The proposed rebuilding plan unanimously adopted by the Gulf of Mexico Fishery Management Council (Gulf Council) last June, was the culmination of a thorough, two year process which included multiple stakeholders and multiple science-based, and peer reviewed analyses of historic fishing data. The federal government published this plan last week, in the form of a rule which will be implemented in federal waters February 28, 2008. It was designed, however, with the coastal states in mind, counting on them to come up with compatible regulations

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in their waters. Compatible state regulations are needed in order to collectively restore red snapper populations to healthy levels able to support catches up to three times higher than current levels.

Under the proposed rebuilding plan, each of the major stakeholders in the fishery – commercial, for-hire charter, and private recreational fishermen, as well as the Gulf shrimp fishery, through bycatch reductions - are asked to make short term sacrifices for the good of the fishery and economy of the region as a whole. Implementation of the rebuilding plan, by all parties, is essential to making this plan work.

Louisiana and Mississippi have already adopted compatible regulations in its waters, Texas has deferred for the time being, and Alabama is reportedly looking to follow Florida's lead. You and this Commission have the opportunity to take a leadership role in this rebuilding plan to restore red snapper to its prominence for all to enjoy.

As mentioned above, our Coalition's steering committee organizations represent millions of citizens across the country and over 200,000 members, businesses and activists in Florida who are deeply concerned for Florida's unique coastal and ocean environment. Red snapper is a significant reef fish resource for Florida's seafood dealers, consumers, conservationists and anglers alike. We urge you to support staff recommendations and pass this rule before you.

Sincerely,

Gary Appelson – Caribbean Conservation Corp.
Jerry Karnas – Environmental Defense
Joe Murphy – Gulf Restoration Network
Sarah Chasis – Natural Resources Defense Council
David White – Ocean Conservancy
Paul G. Johnson – Reef Relief
Ericka D'Avanzo – Surfrider Foundation

cc: Florida Fish & Wildlife Commissioners
Florida Governor Charlie Crist
Texas Governor
Alabama Governor
Mississippi Governor
Louisiana Governor
NOAA/ NMFS