

## **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 • Ocean Conservancy • Environmental Defense Fund

April 3, 2008

Dr. Tom McIlwain, Chair  
Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Re: Public Comment on Reef Fish Amendment 30b, Management of Gag Grouper and Other Reef Fish Species

Dear Dr. McIlwain,

On behalf of the Florida Coastal and Ocean Coalition, please accept these comments regarding the Gulf of Mexico Fishery Management Council's proposed Reef Fish Amendment 30b to the Reef Fish Management Plan pertaining to implementation of management measures for gag and red grouper, and shallow water grouper species. The Coalition is a collaborative effort of environmental organizations joining forces to conserve, protect and restore Florida's coastal and marine environment, including efforts to ensure robust fisheries. Our steering committee organizations represent millions of citizens across the country and over 200,000 members, businesses and activists in Florida deeply concerned for the unique marine resources in Florida and the Gulf of Mexico.

We are deeply concerned about the health of our offshore fisheries and the status of many reef fish populations due to increasing fishing pressure, continued adverse impacts to coastal and marine habitats, and lack of adequate consideration to the biology of individual fish species. We would like to take this opportunity to thank the Council for developing this conservation amendment for Gulf reef fish, and offer the following comments.

The Coalition strongly supports the following objectives for Amendment 30b:

- Setting science-based catch limits for gag grouper immediately;
- Rebuild overfished populations and control all components of fishing mortality, both directed and incidental, to insure long-term sustainability;
- Implement measures to reduce and minimize by-catch;
- Provide for effective enforcement of catch limits, and;
- Protect spawning aggregations and areas that provide habitat for male gag grouper.

In addition, the Coalition supports the following conservation measures for Gulf Reef Fish species:

- With regard to setting gag grouper thresholds and benchmarks, we recommend the adoption of Preferred Alternative 2, Options (a) and (e);
- With regard to setting the Total Allowable Catch (TAC) for gag grouper, we support Preferred Alternative 2;

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- With regard to Individual Fishing Quotas (IFQ), we recommend that the Council complete its work on the grouper IFQ program and support its implementation
- With regard to setting the TAC for red grouper, we support Preferred Alternative 2; and,
- With regard to shallow water grouper interim catch limits and accountability measures, we support Alternative 5.

The Coalition also supports the consideration of marine reserves as a management approach for conservation of gag grouper spawning aggregations and in appropriate areas to protect male gag grouper. We believe the use of marine reserves is critical to assuring the long-term recovery of healthy gag grouper stocks by restoring a more natural age structure and sex ratio. Marine reserves are the most effective approach for protecting the older fish, most of which are males, which is necessary to reduce the risk of recruitment overfishing and stock collapse. As noted by the Council in 2007, marine reserves would “protect the gag spawning aggregations, the spawners of other species, the spawning habitat, and provide year-round protection to gag males/females that remain on shelf-edge reefs.” Moreover, protecting spawning aggregation sites is consistent with the ecosystem-based management approach called for by the U.S. Commission on Ocean Policy, and being adopted by the National Marine Fisheries Service.

Thank you for accepting and considering these comments.

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

cc: Charlie Crist, Governor, State of Florida  
Commissioners, Florida Fish & Wildlife Conservation Commission  
Ken Haddad, Executive Director, Florida Fish & Wildlife Conserv. Commission  
Distribution