

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

May 15, 2008

Sent via Electronic mail

Mr. George Geiger, Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
N. Charleston, SC 29405

RE: Comments on Public Hearing Draft Snapper-Grouper Amendment 16 (Gag Grouper and Vermilion Snapper)

Dear Chairman Geiger,

On behalf of the Florida Coastal and Ocean Coalition (Coalition), please accept these comments regarding the South Atlantic Fishery Management Council's (SAFMC) Public Hearing Draft Snapper-Grouper Amendment 16 (Gag Grouper and Vermilion Snapper). The Coalition is a collaborative effort of conservation organizations which have joined forces to conserve, protect and restore Florida's coastal and marine environments, including restoring marine ecosystems and ensuring 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 South Atlantic.

We are deeply concerned about the health of our offshore fisheries and the status of many reef fish populations due to increasing fishing pressure, bycatch mortality, continued adverse impacts to coastal and marine habitats, and lack of adequate consideration to the biology of individual fish species. We would like to thank the Council for providing this opportunity to submit our views on the Amendment 16, which is intended to end overfishing for gag grouper and vermilion snapper in the South Atlantic, and offer the following comments:

Gag grouper were identified as experiencing overfishing in the Southeast Data Assessment and Review process number ten (SEDAR 10), and vermilion snapper were

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identified as undergoing overfishing in 2007.¹ Consequently, the Coalition recommends that the National Marine Fisheries Service (NMFS) and the SAFMC immediately institute management measures that end overfishing of these two species, achieve optimum yield, incorporate appropriate buffers in catch levels and quotas that are set to ensure that overfishing is prevented, count and minimize bycatch, and protect essential gag spawning areas and depleted male gag in the South Atlantic.

The Coalition also supports the following specific recommendations for Amendment 16:

- We support the Council's preferred alternatives for setting maximum sustainable yield (MSY) and optimum yield (OY) status determination criteria for both gag (**Alternatives 2 and 2b**) and vermilion snapper (**Alternatives 2 and 2b**) as defined by the stock assessment review panel;
- We support the Council's preferred alternatives for setting total allowable catch (TAC) for gag (**Alternative 2**) and vermilion snapper (**Alternative 2**) at the fishing mortality level that achieves optimum yield (OY);
- We support the Council's preferred alternatives that set a hard quota to achieve the commercial portion of the TAC for gag (**Alternative 3**) and vermilion snapper (**Alternative 2**) and to implement a commercial and recreational gag closure to protect spawning aggregations and resident male fish (**Alternative 2**); and,
- We support the Council's preferred alternative to require gear to reduce bycatch mortality in snapper grouper species (such as circle hooks, venting tools, etc.) (**Alternative 2c**).

The Coalition also believes that the SAFMC and NMFS must ensure that management measures to end overfishing of gag grouper and vermilion snapper are implemented as quickly as possible. We urge completion of this amendment and submission to the Secretary at the June council meeting as the one-year time limit for its preparation expires June 12, 2008.

Essential to the sustainability of any fishery resource is ensuring that annual mortality targets and limits – that account for both landed catch and bycatch – for a managed species must end and prevent overfishing, that appropriate buffers are in place to ensure an appropriate likelihood of success, that abundant levels of prey species exist, and that habitats used by these species and their prey are protected. The Magnuson Stevens Fishery Conservation and Management Act (MSA) requires that fisheries must be managed to achieve optimum yield on a continuing basis, not simply to prevent overfishing at the MSY level.² The Coalition is encouraged by the preferred alternatives indicated in the Draft Environmental Impact Statement for Amendment 16 and is supportive, in general, of its contents. We applaud the South Atlantic Council and the Fisheries Service for their leadership and commitment to the critically important issue of ending overfishing and ensuring sustainability of our public trust resources.

¹ Vermilion Snapper SEDAR Update Process #3

² 16 U.S.C. § 1851(a)(1).

The Coalition appreciates the opportunity to provide these comments on the Public Hearing Draft of Amendment 16 to the Snapper Grouper Fishery Management Plan. We look forward to working with the SAFMC and NMFS in the future to ensure the sound management of South Atlantic fishery resources.

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
Ken Haddad, Exec. Director, Florida Fish & Wildlife Conserv. Commission
Rodney Barreto, Chairman, Florida Fish & Wildlife Conserv. Commission
Thomas McIlwain, Chairman, Gulf of Mexico Fishery Mgmt Council
Distribution