

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
North Charleston, SC 29405

RE: Scoping Document for Snapper-Grouper Amendment 18: Provisions to End
Overfishing and Rebuild Red 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) scoping process for the proposed Snapper-Grouper Amendment 18: Provisions to End Overfishing and Rebuild Red Snapper in the South Atlantic (Amendment 18). 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 take this opportunity to thank the Council for providing this opportunity to submit our views on the red snapper scoping process, and offer the following comments:

Red snapper was first identified as "overfished" in 1996, and has since been listed as overfished, undergoing overfishing, or both in every Report to Congress since that time. The Southeast Data Assessment and Review process number fifteen (SEDAR 15) confirms that **overfishing is occurring at over twelve times the acceptable limit** and that the stock is now **grossly overfished, at an estimated 3% of its historic abundance**.¹ Moreover, these SEDAR stock assessment models reveal that overfishing has probably been occurring since 1960, which has driven the red snapper population to an unacceptably low level under any definition.² The Coalition therefore

¹ SEDAR 15 Stock Assessment Report 1 (SAR 1) South Atlantic Red Snapper at 383, February 2008.

² *Id.*, at 203.

strongly recommends that the scoping document include or address the following specific management measures:

- End overfishing immediately;
- Achieve optimum yield;
- Incorporate appropriate buffers in catch levels and quotas that are set to ensure that overfishing is prevented;
- Rebuild red snapper populations as soon as possible;
- Minimize and account for bycatch in the snapper - grouper fisheries; and,
- Protect essential habitat areas in the South Atlantic.

As detailed in the SEDAR 15 stock assessment report, the Coalition agrees that Amendment 18 must include measures that reduce the fishing mortality rate (F) below that level associated with merely prohibiting landings. In order to achieve the target F rate and begin the rebuilding process, both landings and discards must be minimized.³

In addition, the Coalition supports consideration of the following issues that should be analyzed in Amendment 18:

- A broad range of management measures necessary to end overfishing;
- A broad range of alternatives that set and achieve sufficiently precautionary Optimum Yields in the red snapper fishery;
- A broad range of options for rebuilding South Atlantic red snapper within an appropriate timeline with high degrees of success;
- A broad range of area-based measures to reduce red snapper mortality;
- Time-Area Closures aimed at protecting various vulnerable life-history stages of red snapper, for example, to protect both juveniles and large breeders;
- Management measures that reduce bycatch of red snapper in the directed and non-directed fisheries; and,
- Measures that aid in enforcement (specifically, Vessel Monitoring Systems and other tools to increase effectiveness of time and area-based measures).

The SAFMC and National Marine Fisheries Service must ensure that management measures to end overfishing and rebuild red snapper are implemented in the shortest possible time frame. Consequently, we urge completion of an amendment to accomplish this as quickly as possible, but no later than June 2009.

As a final matter, the Coalition would like to stress that preparation of an Environmental Impact Statement (EIS) for Reef Fish Amendments 18 offers the SAFMC an excellent opportunity to take a holistic look at current management strategies and other potential alternatives to ensure that overfishing of South Atlantic snapper-grouper species is finally ended, and that incidental bycatch of these species is minimized. Considering the state of South Atlantic snapper grouper resources, an EIS also presents an opportunity to reassess the efficacy of single-species management measures, and evaluate other alternative strategies that will ensure a successful end to overfishing and ensure healthy, sustainable fisheries into the future. We urge the SAFMC to take full

³ *Id.*, at 203.

advantage of this exercise by not only including analysis of alternatives that end overfishing, but also include the full range of management measures that will ensure targets and timelines are met.

The Coalition appreciates this opportunity to comment on the Scoping Document for Amendment 18 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