



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

RE: State Consistency with Amendment 16 to South Atlantic Fishery Management Council's Snapper Grouper Fishery Management Plan

Dear Chairman Barreto,

On behalf of the Pew Environment Group's *End Overfishing in the Southeast Campaign*, we would like to offer our support for staff recommendations as outlined in the South Atlantic Council Consistency for Vermilion Snapper briefing report dated August 12, 2009. We further urge you to enact a four month spawning season closure for shallow water grouper as described in the South Atlantic Council Consistency for Shallow-water Grouper briefing report dated August 12, 2009.

The shallow water grouper spawning season closure seeks to end more than 30 years of chronic overfishing of gag grouper¹ by setting the catch level at gag's scientifically determined optimum yield (OY). By definition, this produces the greatest economic benefit and will require a 36% reduction in gag grouper catch. The South Atlantic Fishery Management Council considered measures other than seasonal closures, but voted to implement the January through April shallow water grouper closure in order to protect the gag's spawning events, based on the advice of their science advisors.

Gag grouper spawn from December through May of each year,² and form large mating groups called aggregations. When the season and moon phase are right, female gag grouper from a wide area will simultaneously swim to historical breeding grounds. For solitary fish like the gag grouper, spawning outside of an aggregation is unlikely to result in offspring, making these breeding groups crucial to the population.³ Fishing these aggregations is unsustainable and can

¹ Amendment 16 to the Snapper Grouper Fishery Management Plan (2008). South Atlantic Fishery Management Council

² Ibid

³ <http://www.nmfs.noaa.gov/habitat/ead/spawnaggs.htm>

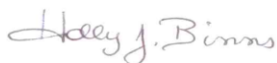
quickly wipe out the resource.⁴ Gag grouper all begin life as females and only some of the largest females are able to eventually change gender to become male. Sampling from the 1970s indicates that more than 20% of the 1978 population of gag grouper was male.⁵ With increased fishing pressure on the largest gags (males), the percentage plummeted to 5% in 2005.⁶ A population where males are rare has obvious implications for reproduction. The need to bring many females in proximity to the few males during breeding makes the gag grouper spawning aggregations even more important.

The current spawning season closure in February and March fails to protect a significant portion of the aggregations, including those during one of the peak month of April.⁷ The inclusion of other species, like red and black grouper, in the spawning season closure serves several purposes. It is a necessary step to end overfishing of gag grouper, since gag is caught when targeting other shallow-water groupers. Additionally, the four month closure protects the spawning aggregations of other snapper and grouper species that are important ecologically and economically to Florida.

Florida statute states that inconsistent regulations “should be avoided” unless inconsistency is in the best interest of Florida’s fisheries or residents.⁸ The long term interests of both the marine environment and stakeholders are in a healthy and sustainable gag grouper population and to achieve that, it is critical to protect gag spawning aggregations.

Thank you for your time and consideration, and for your dedication to Florida’s marine environment.

Sincerely,



Holly Binns
Project Manager
End Overfishing in the Southeast
Pew Environment Group



Sera Drevenak
Policy Analyst
End Overfishing in the Southeast
Pew Environment Group

cc: Commissioner Kathy Barco
Commissioner Ronald Bergeron
Commissioner Richard Corbett
Commissioner Dwight Stephenson
Commissioner Kenneth Wright
Commissioner Brian Yablonski
Mr. Ken Haddad,
Mr. Mark Robson
Dr. Roy Crabtree
Mr. Duane Harris
Mr. Mac Currin
Mr. George Geiger

⁴ Sadovy, Y. and Domeier, M. Are aggregation-fisheries sustainable? Reef fish fisheries as a case study. Coral Reefs, Volume 24 number 2, June 2005.

⁵ McGovern et.al., (1998) Changes in the sex ratio and size at maturity of gag, *Mycteroperca microlepis*, from the Atlantic coast of the southeastern United States during 1976-1995. Fishery Bulletin [Fish. Bull.]. Vol. 96, no. 4, pp. 797-807. Oct 1998.

⁶ Ibid

⁷ Ibid.

⁸ Florida Statutes (2009). Title XXVIII, Chapter 379.2401