

August 5, 2009

Commerce Secretary Locke
c/o Karla Gore
Southeast Regional Office, NMFS
263 13th Avenue South
St. Petersburg, FL 33701

RE: 0648-AX75, Red Snapper Interim Rule

On behalf of the undersigned organizations, we are writing to provide comments in support of the interim rule to reduce overfishing of red snapper.

We are gratified to see the South Atlantic Fishery Management Council (Council) and the National Marine Fisheries Service (NMFS) take a critical step to end overfishing and address the overfished status of red snapper by closing the directed fishery. This action, however, is only the first step to a healthy, sustainable red snapper fishery. Amendment 17-A to the Snapper-Grouper Fishery Management Plan should be enacted without delay, and must include long-term, science based catch limits that include all sources of mortality to ensure the long-term health of the red snapper population.

The Council was informed on July 8, 2008 that red snapper is overfished and is undergoing overfishing. By law, the Council has one year to act. The interim rule by itself will not end overfishing of red snapper, only reduce it. In 2008, dead discards alone totaled more than 200% of the total removals recommended by the South Atlantic Council's Science and Statistical Committee (SSC). The temporary moratorium on directed catch is a positive step, but additional measures to dramatically reduce bycatch must be enacted in order to comply with the revised Magnuson-Stevens Act. Though we fully understand the seriousness of area closures, this is a necessary step to fully satisfy the law and end more than forty years of overfishing.

We strongly believe that SEDAR 15 represents the best available science, and as such is the only appropriate data upon which to base management action. This assessment found that the red snapper population has declined 97.6 percent since 1945. While some fishermen report an increase in landings in recent years, this does not contradict the findings of SEDAR 15. Red snapper may be slowly recovering based on several good year classes, but this recovery is likely to be too slow to sustain the population unless significant protections are provided.

Red snapper populations have been fished at rates up to 14 times higher than the maximum sustainable yield of the species for over 40 years. Strong year-classes of red snapper between

1998 and 2000 have increased the numbers of young fish, but without bycatch reduction these promising year-classes will be fished out. In 2006, SEDAR 15 found that red snapper normally live up to 54 years, but few fish older than 10 remain. Recent landings records also show that the majority (more than 60%) of the snapper killed are caught as bycatch, and discarded.

Overfishing is damaging to both the natural resources of the South Atlantic region, and to the long-term viability of the fishing industry and fishing communities. The Council's vote in March to approve this interim rule shows the kind of stewardship we need from the regional fishery management councils. We are pleased to see the Council rely on the advice of its scientific panel and take the difficult actions necessary to restore healthy and sustainable fisheries. We thank the Council and NMFS for approving this temporary step and look forward to working with them to develop long-term regulations that will put red snapper on course to a full recovery. We urge you to move quickly to approve the red snapper interim rule in order to provide needed protections as quickly as possible.

Sincerely,

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End Overfishing in the Southeast
Pew Environment Group



Dave Allison
Campaign Director
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Laura Pagano
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