



THE  
**PEW**  
ENVIRONMENT GROUP



**END OVERFISHING  
IN THE SOUTHEAST**  
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Chairman Rodney Barreto  
Florida Fish and Wildlife Conservation Commission  
Farris Bryant Building  
620 South Meridian Street  
Tallahassee, FL 32399-1600

Submitted electronically on April 22, 2010

**RE: State Consistency with Federal Red Snapper Regulations**

Chairman Barreto,

Thank you for the opportunity to provide input regarding the proposed change to red snapper regulations in the Gulf of Mexico. We recognize the important role the Florida Fish and Wildlife Conservation Commission (FWC) plays in jointly managing grouper and snapper fisheries off the Florida coast, and offer our support for the staff recommendation to bring the open season for red snapper in the Gulf of Mexico into consistency with the federal season.<sup>1</sup>

Red snapper in the Gulf have long been considered to be both overfished and undergoing overfishing. The 2009 stock assessment<sup>2</sup> revealed that the fishery is still overfished; however, overfishing likely ended last year. The population is also showing signs of recovery, including increases in both abundance and individual average weight. In addition, the population looks to be expanding back into its historical geographic range. This is good news and indicative of a population that is responding positively to the management strategy in place.

However, for a healthy population to meet its full reproductive potential, a robust age class structure needs to be achieved. According to the most recent stock assessment, the percentage of the population that is currently estimated to reach its spawning potential has increased to just under seven percent from about three percent a few years ago. But the fishery will not be considered fully recovered until it reaches 26 percent, as it is projected to do by 2032 under the current rebuilding plan. While individual fish are growing larger and the average age is slightly older, the population is still largely composed of smaller and younger fish that are just reaching reproductive maturity. Red snapper reproduce many times over their lifespan, and generally reach their peak reproductive capacity between the ages of ten and thirty. Thus, many more of these fish need to survive to older ages to increase the likelihood that this population can recover within the scheduled timeframe.

Earlier this year, the Gulf of Mexico Fishery Management Council took action that would increase the amount of fish allowed to be caught by about two million pounds for the entire fishery. This will allow

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<sup>1</sup> Staff presentation on the Recreational Red Snapper Season in the Gulf of Mexico, report date: March 22, 2010.

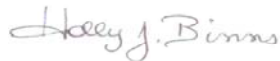
<sup>2</sup> Stock Assessment of Red Snapper in the Gulf of Mexico. SEDAR Update Assessment 5.0. Report of the Update Assessment Workshop. Miami, Florida. August 24-28, 2009. 224 pp. Accepted by the Gulf of Mexico Fishery Management Council's Science and Statistical (SSC) and Reef Fish SSC Committees

the recreational fishery's catch level to increase from 2.45 million pounds to 3.4 million pounds in 2010. Although the vast majority of individual recreational anglers abide by the current rules, unfortunately the recreational sector as a whole exceeded last year's allowable catch limit by almost two million pounds. Based on catch rates and other data from past seasons, it is anticipated that the recreational sector will likely land this year's allowable catch in less time than the previous year's season. Thus, although the overall limit is higher, it is still necessary to reduce the season from 75 days in 2009 to 51-60 days. The season change is intended to maintain landings at the prescribed levels and enable the red snapper population to rebuild within the projected timeframe.

Maintaining consistent regulations will help keep red snapper mortality at the level deemed to be sustainable by federal managers and will allow larger, more mature fish to survive, which is vital for the sustainability of the population and the fishery. Increases in the allowable catch are projected for subsequent years as well, but those increases and the length of future seasons hinge on maintaining catch at levels that correspond to the rebuilding plan for red snapper in the Gulf.

By enacting consistent regulations at the April 29, 2010 meeting, the FWC can make monitoring and enforcement easier and more effective, avoid confusion for the fishing public and ensure the rebuilding plan is a success.

Sincerely,



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Mr. William Teehan  
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