



August 31, 2022

Mel Bell  
Chair, South Atlantic Fishery Management Council  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

Florida Fish  
and Wildlife  
Conservation  
Commission

Re: Snapper Grouper Regulatory Amendment 35; Snapper Grouper Release Mortality Reduction and Red Snapper Catch Levels

Commissioners  
**Rodney Barreto**  
Chairman  
Coral Gables

**Steven Hudson**  
Vice Chairman  
Fort Lauderdale

**Gary Lester**  
Oxford

**Albert Maury**  
Coral Gables

**Gary Nicklaus**  
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St. Augustine

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*Managing fish and wildlife  
resources for their long-term  
well-being and the benefit  
of people.*

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Dear Mr. Bell:

Despite considerable stock rebuilding, near record levels of abundance, and age structure expansion, the Atlantic red snapper stock continues to be overfished and undergoing overfishing. According to the assessment, this stock status is primarily driven by high recreational discards. Amendment 35 to the Snapper Grouper Fishery Management Plan includes options to reduce release mortality across the entire snapper grouper fishery and adjust red snapper catch levels based on the SSC's recommendation. Management options being considered to reduce release mortality include gear modifications and temporal and spatial closures for the entire snapper grouper complex. The Florida Fish and Wildlife Conservation Commission (FWC) is committed to working with the Council to find options to help reduce release mortality, including gear modifications and increased outreach and education on the use and benefits of descending devices; however, FWC strongly opposes any temporal or spatial closures off Florida for a number of reasons.

Amendment 35 is largely being driven by unvalidated discard data. Specifically, there is no age or length information available to characterize these dead discards as is required for valid and accurate stock assessments. Instead, the majority of commercial discard information and all of recreational discard information is self-reported. Furthermore, the Council's own SSC recently noted at the June 2022 meeting that the discard data is "largely unvalidated and may not be accurate for the snapper grouper complex." Using this unvalidated discard data to potentially close large areas of the South Atlantic to all snapper grouper fishing is draconian and should give the Council pause before making extreme management decisions.

Public trust is an essential part of being able to effectively manage natural resources. FWC understands the difficult decisions the Council is facing currently, but management decisions should always be based on accurate and precise scientific data that comprehensively consider the biological, ecological, social, and economic effects. Compounding uncertainty with federal Marine Recreational Information Program (MRIP) landings data even further with more uncertain discard data is an issue and would completely erode any remaining public trust that federal fishery managers have.

Furthermore, dozens of species comprise the snapper grouper complex, many of which have healthy stocks, and a vast majority of these species are important fisheries in Florida waters. Florida is known as the "Fishing and Boating Capital of the World" because anglers have access to a multitude of inshore and offshore fish species 365 days of the year. Any decisions the Council makes regarding snapper grouper species will

significantly impact Florida fishers, Florida's economy, and Florida's local communities. The concept of temporal or spatial closures to an entire complex to solve the problems of one species would not only devastate Florida's local communities and economy, but it is counter to FWC's mission to provide reasonable access to a public resource.

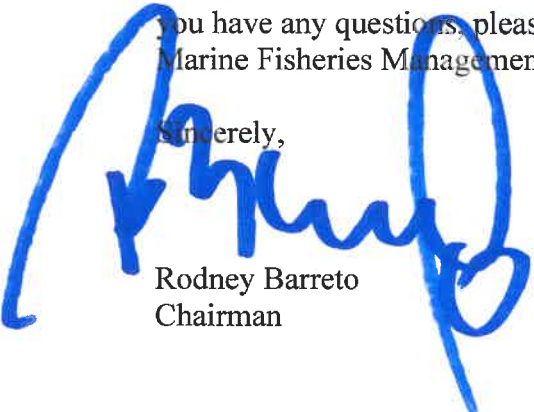
As a leader in fisheries research and management, FWC continues to support innovative recreational data collection along the South Atlantic. In 2020, FWC expanded its successful Gulf Reef Fish Survey to the east coast of Florida, creating the State Reef Fish Survey (SRFS). SRFS focuses on thirteen reef fish species caught by anglers and ensures that valuable recreational catch and effort information is collected to allow fisheries managers to better manage the resource in a timely manner. While MRIP struggles with providing good catch estimates for many reef fish, especially Atlantic red snapper, FWC is working to better understand how recreational data collection programs can be improved. To this point, FWC supports additional research being conducted to improve upon recreational discard data such that unvalidated discard data are no longer used to make management decisions.

Looking forward, FWC is working on options to help reduce release mortality across snapper grouper species in the South Atlantic and the Gulf of Mexico. At the upcoming September FWC Commission meeting, staff will present proposed rules to require the use of descending devices or venting tools in all state waters to help increase the survival of released reef fish. To maximize the effectiveness of these barotrauma mitigation tools, FWC is working to increase fishers' awareness and user confidence and help increase compliance in federal waters. FWC is fine-tuning existing outreach and education efforts and collaborating with regional partners on projects and messaging, which is vital for generating fisher buy-in, proper use, and increased regulatory compliance.

Lastly, FWC looks forward to the Council continuing to work on the development of a federal permit and data collection program to help narrow down the universe of private recreational anglers targeting snapper grouper species, improving discard data, and for the results of the Management Strategy Evaluation for the snapper grouper fishery. Additionally, FWC supports the Council considering innovative management ideas within the snapper grouper fishery before considering temporal or spatial closures. In conclusion, while FWC recognizes the challenging predicament fishery managers are facing with Atlantic red snapper, and that certain actions must be taken to help reduce release mortality, FWC cannot support any temporal or spatial closures.

As trustees of the resource, we all must do everything we can to help our commercial and recreational fishers while conserving our fisheries resources for future generations. If you have any questions, please contact Jessica McCawley, Director of the Division of Marine Fisheries Management, at 850-487-0554.

Sincerely,



Rodney Barreto  
Chairman