



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



February 15, 2016

Jessica McCawley, Director
Division of Marine Fisheries Management
Florida Fish and Wildlife Conservation Commission
2590 Executive Center Circle E, Suite 201
Tallahassee, FL 32301

Jessica,

On behalf of the over 1,300 members of the West Palm Beach Fishing Club (WPBFC) I submit the following comments regarding the future management of barracuda in state waters. I am not certain whether or not the WPBFC will have a representative at one of the upcoming barracuda workshops, so I wanted to send our written comments to you prior to those meetings.

WPBFC members have noticed a serious decline in barracuda abundance over the past decade in the waters off of Palm Beach County. Similar declines have occurred in the waters off Broward, Miami-Dade and Monroe counties. Large schools of these fish once were commonplace, especially near high relief natural reefs and artificial reefs. Barracuda is a highly prized game fish, especially among light tackle and fly anglers. Often times these hearty fish are caught and successfully released to fight another day. The fish has also served our local charter sportfishing fleet well through the years because it was always a fish they could rely upon to save the day in the event that the sailfish, kingfish or dolphin bite was slow. The thrill of catching a barracuda has turned many a slow day into a memorable one for countless Florida visitors. Unfortunately, there is little opportunity to target these fish anymore because they have been so severely overfished.

The WPBFC was encouraged to see the FWC finally take action last year by implementing stricter recreational and commercial catch limits on barracuda. The current 2 fish per person bag limit allows anglers who enjoy eating small barracuda a chance to catch enough for a meal. It also gives anglers the flexibility

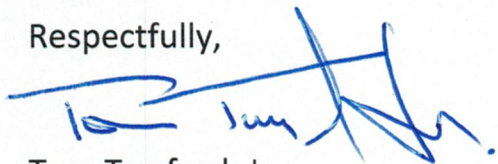
to keep a few fish for bait since barracuda are sometimes used for cut bait. Last year's regulation change was a step in the right direction. However, the WPBFC believes more can and should be done to help rebuild barracuda stocks.

The WPBFC suggests that only one 'Trophy' fish of over 36" be allowed per angler within the 2 fish bag limit. We have no recommendation on a minimum size limit simply because it is the smaller fish that are generally favored by those who plan on eating barracuda. The WPBFC supports a reduction in the current 6 barracuda per vessel limit, to a limit of 4 barracuda per vessel.

Most importantly, the WPBFC recommends that barracuda be removed from the commercial marketplace. Prohibiting the commercial sale of barracuda would reduce the incentive to catch and keep the current 6 fish per vessel limit. The commercial fishery for barracuda has always been minimal compared to other species like kingfish, Spanish mackerel and dolphin. Barracuda is not a popular fish in local seafood markets or restaurants. In fact, the commercial sale of barracuda, especially very large specimens, has always been suspect in our view from a public health standpoint do to the potential of ciguatera poisoning. Additionally, there have been documented instances where barracuda have been fraudulently sold in restaurants under the guise of other names. The WPBFC believes that prohibiting the commercial sale of barracuda will significantly reduce these public safety risks and is the single most effective approach towards improving barracuda abundance on South Florida reefs.

The WPBFC appreciates the opportunity to provide comment. We look forward to improved barracuda management in the future that will lead to the return of schools of these great fish on South Florida reefs.

Respectfully,

A handwritten signature in blue ink, appearing to read "Tom Twyford, Jr.", with a stylized flourish at the end.

Tom Twyford, Jr.
President

Cc: Pete Schulz, WPBFC Chairman
John Jolley, WPBFC Scientific Advisor
Mason Smith, FWC Biological Scientist