



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



November 6, 2015

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

Dear Jessica:

I am writing on behalf of the over 1,300 members of the West Palm Beach Fishing Club (WPBFC) regarding the Florida Fish & Wildlife Conservation Commission's (FWC) upcoming discussion regarding mutton snapper management. Since we will be unable to attend the November commission meeting in Panama City Beach, I wanted to send you our written comments.

The WPBFC supports reducing the recreational bag limit in state and federal waters to five (5) fish per angler. We believe the current ten (10) fish per angler bag limit is excessive and not necessary. It is our observation that on most outings anglers in our area rarely catch their ten (10) fish limit of legal sized muttons, but rather it is a mixed bag of snappers that often include mangrove, yellowtail or lane snappers. We believe the ten (10) snapper aggregate limit should remain the same. The current 16-inch minimum size limit for mutton snapper appears to be adequate in our view. We do not recommend any changes to the minimum size limit regulation. Anglers in our region catch a lot of 14 to 15 inch muttons, which we believe is a good sign. It is not unusual to catch and release four to six undersized muttons for every legal sized fish. Additionally, we frequently catch muttons in the 8 to 14-inch size range when fishing inside the Lake Worth Lagoon for other varieties of fish. We believe increased habitat enhancement efforts in the lagoon may be playing a positive role.

Anecdotally, we see some of the best mutton snapper catches occur each fall following a heavy swell from the north, generally associated with a storm. When this occurs the muttons move away from the deeper reefs and into shallower water. It is not uncommon to hear about significant catches of muttons from local piers or jetties when this phenomenon occurs. This generally happens once or twice a year and the duration of these snapper runs is usually only a few days. Once the seas calm the fish begin to disperse back to the reef.

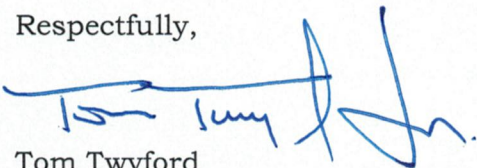
Notably, we do not see a dramatic increase in mutton snapper catches during the spring time spawning period. We are not aware of any significant spawning aggregations that anglers are targeting off the Palm Beaches. While some aggregations no doubt occur, they are very difficult to fish due to the strong current off our coast. Relatively few recreational anglers are willing or have the know-how and equipment to

effectively anchor over site specific snapper spots. Significant spawning aggregations that are well documented should be monitored and may deserve additional protection, especially those sites that are highly vulnerable to spearfishermen as well as commercial and recreational anglers. We are hesitant to recommend any seasonal closure of mutton snapper at this time unless it is determined that such a closure is absolutely necessary to rebuild stocks. A seasonal closure on mutton snapper would likely have negative economic impacts on local drift boat operators who depend heavily on a mixed bag of reef fish for their clients. Local tackle shops that supply bait and tackle would also be impacted. One important thing to consider is that even if a closure was implemented, anglers would still continue to catch muttons while fishing the reef for other varieties of fish that inhabit the same drift fishing areas. So some catch and release mortality will still occur.

While drift fishing charter boats and recreational small boaters do target muttons and other reef fish, please know that for many recreational anglers mutton snapper is a 'fall back' fish. By this I mean that many anglers will spend the morning trolling for dolphin and other pelagic species in our region, then fall back to the reef and drift fish if they were not able to catch dolphin, wahoo or blackfin tuna offshore. Muttons are a fish that can save the day when the offshore bite is not productive. We believe giving anglers a variety of options like this to put a few fish in the box is beneficial, not just to the angler, but it also helps reduce angling pressure on other varieties of fish. Closing a portion of the season for muttons would redirect additional pressure on other species.

We encourage the FWC to continue to work cooperatively with the South Atlantic Fishery Management Council to maintain similar recreational fishing regulations for popular fish species, like mutton snapper, in both state and federal waters. We believe a significant reduction in the mutton snapper recreational bag limit, from ten (10) fish to five (5) would be a prudent and acceptable first step towards improving mutton snapper abundance. A reduction in the commercial trip limit may be warranted as well, especially during the spawning season. However, we would discourage a total commercial closure. Hook and line commercial anglers provide a high quality product to the marketplace, especially for the seafood consumer who does not fish. The WPBFC is supportive of sustainable hook and line commercial angling and the role those anglers play in the industry. Thank you for the opportunity to provide comment.

Respectfully,

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

Tom Twyford
President

Cc: Pete Schulz, Chairman WPBFC
John Jolley, WPBFC Scientific Advisor
Chester Brewer, WPBFC Board member & SAFMC member
Capt. Bill Taylor, Black Dog Drift Fishing
Capt. Butch Constable, Jupiter Fishing Guide
Capt. Greg Bogdan, Permitted Fishing Charters