



# WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



February 18, 2016

Gregg Waugh, Executive Director  
South Atlantic Fishery Management Council  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

Dear Gregg,

The venerable West Palm Beach Fishing Club (WPBFC), one of the largest, oldest and most active institutions of its kind, supports and congratulates the South Atlantic Fishery Management Council (SAFMC) on its leadership and collaborative efforts to establish Spawning Special Management Zones (SMZ's) as proposed in Amendment 36 that are designed to protect important spawning aggregations of fishes in the snapper - grouper complex.

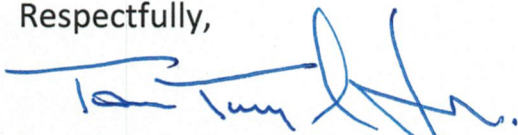
We are acutely aware that unique sites exist along coastlines where various reef species congregate annually to reproduce. Since many deep water reef species' declines have been well documented, additional measures seem logical and locations where spawning aggregations of these fish are known to occur appear to be worthy of additional protection. The SAFMC's proposals prioritizing three (3) new SMZ's: One off South Carolina (Devil's Hole); one off North Carolina (South Cape Lookout site); and one off Key West (Warsaw Hole) appear sound and carefully thought out, and your advisory panel agrees. We support the council's reduction in the overall number of SMZ sites being created. A total of three (3) sites spread out across the council's region appears to be reasonable. We applaud the science based site selection approach the council has taken thus far, and see this as a modest and cautionary first step in expanding management

protection for deep water reef species when they are most vulnerable to overfishing. In our view this is a far more acceptable management approach compared to other proposals being made by groups like 'Our Florida Reefs' that would prohibit fishing over significant portions of the reef tract.

The WPBFC strongly supports elements of the council's SMZ proposal that: allow for trolling for pelagic species in the designated areas; prohibits anchoring in the designated areas; includes periodic research and monitoring of each site to evaluate their effectiveness; and includes a sunset provision requiring reevaluation after a determined period of time. These critical elements will help minimize economic hardships and improve transparency with the angling public.

The WPBFC fully recognizes the controversial nature of prohibiting bottom fishing at these sites. However, we believe identifying and protecting important spawning aggregations is justified and may in fact be one of the most effective and economically acceptable ways to rebuild overfished species in the snapper-grouper complex. Furthermore, the WPBFC has a genuine interest in helping establish a new deep water artificial reef site off Palm Beach County that could potentially serve as a protected spawning refuge for overfished species like Warsaw grouper and speckled hind. We are currently exploring the feasibility of such a project with Palm Beach County's Department of Environmental Resources Management, the local agency that oversees reef building and estuarine enhancement. The WPBFC supports these measures as we compare the strong biological successes that previous endeavors have demonstrated and which we supported in the Dry Tortugas.

Respectfully,



Tom Twyford, WPBFC President

Encl: Pete Schulz, WPBFC Chairman

John Jolley, WPBFC Scientific Advisor

Jessica R. McCawley, FWC Director Division of Marine Fisheries Mgt.

Rob Robbins, Director Palm Beach County ERM