



Sept 6, 2016

Florida Fish and Wildlife Conservation Commission
Tallahassee, Florida

Re: Conservation of Reef Fish Spawning Sites in State Waters

Honorable Commissioners,

Thank you for the opportunity to provide these comments. This is a follow-up to a letter I sent before your last meeting in June 2016. I've lived in four counties on Florida's east coast since 1974, raising kids who dive and fish.

Over the years, despite understandable short-term pushback against pro-conservation positions, the FWC has taken the lead on diverse marine conservation issues (many listed in my prior letter) - with long term results that absolutely justified what was once controversial.

I and other researchers are pleased that the FWC is displaying interest in the status of several spawning aggregations at the Western Dry Rocks/Boca Grande Bar in State waters near Key West. Both old and new evidence has been summarized and recently submitted by Dr. W. Heyman and others which demonstrates what many local fishers have long known: the Boca Grande Bar site supports mutton snapper, black grouper and permit *spawning* aggregations. Common sense and a large scientific literature supports the importance of protecting spawning aggregations from overfishing for the long-term benefit of the fishers themselves; the literature on this is now immense and I believe has been recently summarized for the commissioners and staff.

Many are particularly concerned about the mutton snapper spawning aggregation which has been heavily fished during spawning months for decades with increasing reports of highly reduced numbers. Such reef fish aggregations can be fished to extinction (e.g., Nassau grouper).

New size and bag regulations are clearly needed and highly endorsed, but given the highly impacted status of the mutton snapper aggregation, I and many colleagues suggest that it is time to begin a process to: 1) *characterize the current status of these spawning aggregations with in-water research* and 2) *initiate a process to develop a seasonal closure as needed for the long term benefit of all.*

As you know, these sites can't be fished to functional extinction under anyone's watch. Your continuing interest is appreciated and respected. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Lindeman".

Ken Lindeman, Ph.D.
Professor, Sustainability Program Chair

To: Ms. Jessica McCawley, Division Director
Ms. Erika Burgess, Fisheries Mgmt Analyst

From: Robert S. Neale

Re: Follow-up on Amendment 41
Meeting 8/15/2016 in Dania Beach, FL

Date: August 17, 2016

Pursuant to your request, I will attempt to recant our discussion at the meeting as referenced above.

As previously stated we know that the mutton snapper fishery is not and has not been over fished, but this effort is trying to ensure that is the case in the future.

I am a current stake holder in the south atlantic snapper grouper fishery and have the following recommendations and comments;

As we know the commercial sector has only 17% of the quota for mutton snapper. I do not fish spawning aggregation sites in keys or any other aggregation sites.

I fish primarily natural bottom and mostly in federal waters out of Jupiter inlet.

Currently the commercial quota is not being met and has not been for a while. Even with the proposed new total allowable catch numbers it does not look like they're going to be met.

Reasons for this appear to be fewer stake holders that participate in the mutton snapper fishery due to attrition, buyouts and age.

Very few people now have catches over 500 pounds and that's with unlimited that now exist.

Thus the magnanimous suggestion of of having up to 500 pounds in non-spawning months is not viable and should be the 300 pounds.

This would allow for the spreading out of the desired catch of animals throughout the fishing year including during the spawning months.

This should allow the commercial sector to retain the 10 fish per person and putting a trip limit of say 30 fish maybe 25 if there is more than one person on the boat. I usually fish with one other person due to my age as well as safety reasons.

The lobster and stone crab fisherman most often fish the late spring and summer months to keep things going until their fisheries reopen in August and October. Yes I

know that coincides with the spawning months but they need the revenue. No boat can go out for three fish per person especially in areas where there are no yellow tail fishery.

I am ok with increasing the size from 16 to 18 inches.

Regarding the concerns of the currently open spawning site then you should address those areas and limit production to three fish recreational or commercial.

Also another point is that mutton snappers do migrate and are not usually available in any meaningful quantities in the winter months not to mention the weather is usually a lot more treacherous.

As I also mentioned water quality is extremely important. During the summer I have my five recreational blue crab traps inside the river and every trip there are juvenile mutton snapper in the traps trying to get to the blue crabs (usually 12 to 14 inches) so the blue crabs. So the blue green algae bloom could have a serious effect on all the snappers and everything else that lives in our estuaries I know you are aware of what recently happened in St. Lucie to Palm Beach in July.

Lastly it was good to hear and see the recreational sector was very supportive of my recommendations. I also thought their thought process of increasing from three fish to five fish at 18 inches still gave a desired outcome and should strongly be considered. Along with the two day possession limit when over nighters at Fort Jefferson.

Thank you for your time and I agree with Ben Hartig that this was a good constructive meeting. The alternatives that were presented by both sectors and supported by both sectors will work and this is a fair compromise.

PAR DI Services, Inc.
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Subject: 2015 public comment on Mutton Snapper

Dear members on the Commission:

My name is Gregory Mercurio and I am the owner and operator of the 'YANKEE CAPTS' an inspected vessel that carries 50 passengers doing multi-day fishing trips. We have been fishing out of Key West, Florida since 1977, specializing in running 2-4 day trips to the Dry Tortugas and other offshore fishing grounds. I have personally been the operator of these trips since 1985, and do so as of this time. I am also a member of the GOMFC serving on 2 advisory panels, Headboat Advisory and Red Snapper Ad Hoc.

From 1977 until 2011, we averaged 150 days of fishing over that timer period. In 2012, I permanently relocated the operation to Key West, and we now have averaged 275 days year of fishing in the Dry Tortugas, South Atlantic and Gulf of Mexico waters.

Mutton snapper has been the mainstay fishery for my customers since the 'YANKEE CAPTS' began fishing out of Key West. To say I am a stakeholder within this particular fishery is an understatement. During the last three decades I have been directly involved in this fishery, I have seen and operated under the low and now high cycle of mutton snapper fishing, but more so, regulatory controls to manage this fishery over the years and can consider it one of the most successful stock rebuilding stories in the Southern Florida and Gulf of Mexico region.

That being said, I urge the commission to be extremely cautious in moving forward with any new proposed restrictions in the

regulations since the current fishery management policy for mutton snapper continues to maintain the viability of the stock and sustainability for all user groups in this fishery.

I have several points for you to consider:

1- The 2015 mutton snapper stock assessment conducted by FWRI, showed that the stock status being “not overfished and overfishing is not occurring.”

This is within an updated assessment which is consistent and reaffirms the previous stock assessment’s findings on mutton snapper in which the biomass is deemed “healthy.” However, due to changes within the new assessment model, it has resulted in a lower estimate of the size of the adult population.

The SSC can make all sorts of changes to the model to get a wide array of outcomes in measuring biomass size and age structure of any fish stock. This is now a commonly discussed theme at fishery meetings in designing fishery management plans and within that, fishing limits not only for the upcoming year but in the years to follow.

Yet the new changes in the modeling has morphed into something much different in managing a fish stock that has complied with the mandates within the MSA to prevent over fishing, as now the technical committee has induced greater bias in the weighting of certain stock age structure variables and indices to estimate biomass size, which is in direct contrast to what all fishermen are seeing with the quantity of

but undersize and legal to harvest mutton snapper on the fishing grounds.

It is nonsense as they are increasing the uncertainty within the models, thus becoming more risk averse at a time when fishing effort and harvest has remained relatively constant for all age classes through the last few years. This added statistical bias has little to do with the latest status of the stock, current or projected, and fishing effort upon the stock.

2- Please also consider that the recreational ACL as of November 1, 2015 is at 71%. For 2015 and for every year prior, the recreational sectors has not been reaching this sectors allotted ACL. This has been documented both on MRIP and VTR data, and is clear evidence that there is enough "buffer" built within the current mutton snapper management plan to prevent over fishing during the year.

3- A small group of stakeholders have suggested as a pre-emptive measure, to reduce the mutton snapper recreational bag limit to 5 fish during the regular season and to 2 fish during the spawning season (May-June).

After three decades of directly being involved in the mutton snapper fishery, I don't see how practical this is and how this will work in protecting mutton snapper during the supposed spawning period of May/June. The issue that the Commission is trying to address is age structure of two year classes of adult fish, not juvenile recruitment or spawning as these few stakeholders believe.

I have personally seen mutton snappers with spawn in them 10 months out of the year. Within the latest "Update to SEDAR 15A" it notes this on page 10, *"with a spawning season extending from April through October."*

In fact and after three decades of fishing the waters surrounding Florida, one of the biggest spawning aggregates in the Tortugas outside of Riley's Hump occurs in December. Here we have 9 – 10 spawning aggregates in the Tortugas area that occur during a 7 month span. The presence of spawn is well documented by my NOAA data collector that conducts sampling 2 times a month at the end of my trips.

4- Contrary to what a small group of stakeholders stated about greatly reducing the bag recreational bag limit during the May/June spawning period, just in the last two years mutton snapper did not spawn in May/June off of Key West. This was due to some natural weather conditions that occurred in the region, and spawning then occurring much earlier in the year. This also has been documented by NOAA data collectors.

5- In the mid 1990's, stakeholders recommended to NOAA in order to rebuild the stock in proposing closing Riley's Hump instead of closing Rebecca Channel. The thought process was based upon observation and fishing effort during the years prior, and the belief was to be pro-active in protecting the mutton snapper and grouper complex spawn.

Looking back some two decades later, we can all agree that this pre-emptive measure was a major success, not only for

the stock but also to the cooperation between fishery managers and stakeholders. The entire state of Florida since that time has enjoyed and benefitted from a healthy mutton snapper fishery due to stakeholder input.

6- I also would like to return back to one of the original statements within the "Update to SEDAR 15A" where this was written:

"Although mutton snapper is not overfished or undergoing overfishing",

What is this, as it comes across as "double talk" to those not only within the fishing industry, but the recreational fishing community when those who manage our fisheries, make this as an official statement?

What is the laymen, recreational fishermen, along with those involved in the fishing industry supposed to think when reviewing "Update to SEDAR 15A" on the mutton snapper fishery when there are other fisheries along the east coast of this country that fishery regulators do have concerns about rebuilding or preventing over fishing and need to be monitored closely? NOAA data shows that the mutton snapper fishery is on the other end of the regulatory spectrum as far as reported harvest and discards, thus negating the need for any major restrictive regulatory changes.

As a longtime stakeholder in this fishery, I do have several suggestions for you to consider if regulatory changes are to

be made in the upcoming fishing seasons.

- I would like to see the mutton snapper size limit raised from the current minimum 16" size, gradually increased to 18" or 20" over the calendar years of 2016 and 2017. It will then be the largest minimum size limit for any snapper. This would be an immediate beneficial way we could get one to two more spawning cycles on the current year classes of harvestable fish. Also according to NMFS a 2" increase in size limit shows a 60% catch reduction per year.
- A change in the daily bag limit from 10 fish per person per day to 5.
- Not considering closing Western Dry Rocks is a mistake. Riley's Hump MPA was a huge success. I can personally attest to that. I know plenty of push back was received from local interests here in Key West. Most of it from the charter boat fleet. Their main concern being they will not be able to troll in that area. Many MPA's already allow that exclusion. It should strongly be considered in this situation. FWC should move forward with a plan that closes Western Dry Rocks. It is the best tool for protecting spawning aggregations of reef fish.
- An increase in the collection of sampling onboard for-hire vessels along with more dockside intercepts throughout the year which will result in better practical data on fishing behavior when directly and indirectly

targeting mutton snapper for the SSC to consider before we proceed with any further drastic regulatory changes to the mutton snapper fishery.

- More corroboration with all user groups to lessen what comes across as an agenda driven regulatory process, and to lessen the negative economic impact to not only the fishing industry but as much those shore side communities which rely upon fishing related activities. This is written within the MSA – National Standard (8):

“Consider fishing communities to provide for their sustained participation and to minimize adverse economic impacts.”

I am always available to help the commission in any way with input and or collection of data upon the ‘YANKEE CAPTS’.

Please do not hesitate to contact me at:
greg@yankeecaps.com.

For your consideration,
Captain Gregory Mercurio

Yankee Caps Offshore Fishing Inc.
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Key West, FL 33045
Cell Phone: 305.923.4401
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Marco Sportfishing Club

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Marco Island, FL 34146-2104

www.marcosportfishingclub.com



August 17, 2016

Ms. Martha Guyas, Section Leader, FWC and Gulf Council
Ms. Jessica McCawley, Division Director, FWC

Subject: Public Comment on Mutton Snapper Proposed New Regulations

Dear Ms. McCawley and Ms. Guyas,

Thank you for providing the opportunity for public input regarding last week's meeting regarding Mutton Snapper to discuss FWC's AND the Gulf Council's proposed changes to Mutton Snapper regulations. I am writing you on behalf of the Marco Sportfishing Club (MSC).

To give you a better understanding of who we are...The Marco Sportfishing Club is a non-profit organization comprised of 427 fishermen, boaters and outdoor enthusiasts who live in the Marco Island, FL area. Our memberships are "family" memberships, so our membership number is actually 781 individuals, making us one of the largest (if not, **the** largest) fishing club in Southwest Florida. In addition to enjoying all the outdoor activities this beautiful Southwest Florida location has to offer, the Club prides itself in its ability to "give back" to the community. Members of the club are active and involved in the community and have been instrumental in organizing and staffing many events that teach local children the joys of fishing and good fishing etiquette. The events and organizations MSC has been involved with include the Marco Island Cub Scouts, Marco Island Historical Museum, National Estuaries Day at Rookery Bay, The Naples Kids Fishing Clinic, Goodland's Birthday Celebration, Naples Botanical Gardens, and the Port of the Isles Kids Fishing Clinic. To find out more about the Marco Sportfishing Club, and see the types of events and activities we provide, please go to www.marcosportfishingclub.com.

The original invitation was to address proposed changes in State waters, however, the Gulf Council was there under the premise it would best if both State and Federal waters were under the same rule. Not a bad idea, but representing SW FL where catching legal sized muttons in State Waters is pretty rare indeed.

The 2015 stock assessment suggests that Mutton Snapper is not overfished, but there are some big holes in that data that excludes Charter boats and poor data at best from the recreational fishermen. It became clear during testimony from many of the public speakers that without having more complete data, meaning the changes proposed are based on incomplete data, there should be no changes enacted before more data is collected from key user groups that can offer a more complete representation of the Stock Assessment. Which we believe is a valid point.

One slide presented regarding Mutton Snapper spawning, is that it can start as early as possibly April through possibly August. Peak spawning occurs during the full moons of May, June and July, and individual fish will spawn multiple times per season. Large aggregations spawn at small but predictable epicenters such as Riley's Hump in Federal Waters which is closed to harvest, and the Western Dry Rocks which is in State waters and is open to harvest. The Western Dry Rocks spawning area is small; only 1 square mile. The irony to us is that if State and Federal Management wants to apply the same rules, why are the Western Dry Rocks open to harvest during the peak spawning period, and Riley's Hump is closed year round??

According to the presentation, if the proposed rules are adopted, and apply to both State and Federal waters for consistency, and reduce the harvest by 74% and 32% for Recreational and Commercial harvest, respectively. We recreational anglers are already over regulated, so we cannot support this expectation based on current data presented.

Request for Feedback

On behalf of the Marco Sportfishing Club and its members, we submit the following responses.

- Do you support an 18 inch minimum size limit for the recreational and commercial harvest of mutton snapper? (16" minimum is current min.)

The MSC membership does not support this change. It was suggested that at 18" a female mutton would be able to reproduce at this length, but that 18" female would spawn in areas where her eggs would likely never contribute to the biomass of a new Class Year of fish as compared to Riley's Hump and the Western Rocks. Bigger fish produce more eggs, and better eggs. The life cycle of smaller fish will succumb to predation. The adult large breeders should be protected. We concur with the comments on this topic as were made by Mr. Mike Newman.

- What is your preference for a recreational bag limit?
 - a. 3 fish per person year round
 - b. 5 fish July-March and 2 fish April through June?
 - i. **Note: the presentation stated that the greatest period of mutton snapper spawn was May-July. Seems we have a contradiction in option b. by omitting the July spawn, correct??**

Our position is that we keep it 10. It is rare that we get more than 2-4 muttons in deep water during a day's trip. If someone happens to get a banner day and catches 10, God Blessed Them! The mutton snapper life cycle is much different than Red Snapper; they grow much faster.

- Should the Atlantic Commercial trip limit be the same as the recreational bag limit during the spawning season (April-June)?
 - i. Note: the prime spawning months are May, June and July as stated in our meeting by the panel, noting that it could possibly start as early as April and as late as August. Seems we have a disconnect in the question. No July??**
- Is a 500 pound Atlantic commercial trip limit appropriate from July-March?
 - a. Our position is NO. First, July is a prime spawning month. Second, last February, the recommendation was 300 lbs. and now you ask for 500 lbs. Why? That's a 66% increase!! Also, there should be no commercial sales of Mutton Snapper during the spawning season. So, just to reiterate, our position is NO.**
- Are additional regulations needed at Western Dry Rocks?
 - a. Our position is a resounding YES! Riley's Hump and the Western Dry Rocks are the epicenters, and small ones at that, for the big breeding fish to aggregate and spawn a new Class Year of fish. Riley's Hump is closed year round as I understand it, so why not be consistent with both State and Federal Waters to close the both areas year round, or, close them both during the spawning months and open them up from August to April? That would be consistent.**

Respectfully,

Sam Young
Director, Fisheries Management
Marco Sportfishing Club
Young456@aol.com
Cell: 239-595-6341

Howard Laskau
President
Marco Sportfishing Club
hlaskau@comcast.net
Cell: 201-704-0788



August 10, 2016

Dear FWC Commissioners,

On behalf of the Guy Harvey Ocean Foundation (GHOF) and all of our members, I write this letter in support of the call to take a pro-active approach to mutton snapper management.

The GHOF conducts scientific research and hosts educational programs aimed at conserving the marine environment. The GHOF also funds affiliated researchers working to better understand our ocean ecosystem and educators helping to foster the next era of marine conservationists. The GHOF aims to help ensure that future generations can enjoy and benefit from a properly balanced ocean ecosystem.

We call for the adoption of the FWC staff recommendations:

- Increasing the recreational and commercial harvest, and importation and sale minimum size limits to 18 inches;
- Reducing the recreational bag limit to three fish per person within the 10-fish snapper aggregate bag limit;
- Replacing the May through June commercial trip limit in all state waters with a three-fish per person per day limit from April through June in Atlantic state waters only; and
- Establishing a 300-pound commercial trip limit for the remainder of the year (July – March) in Atlantic state waters only.

In addition, the GHOF urges the Commission to take further action by closing the Western Dry Rocks during the mutton snapper spawning season (April-July). This area is small (1 square mile) but extremely significant as a spawning aggregation site for mutton snapper, black grouper and permit. A similar closure at Riley's Hump in the Dry Tortugas reported a 400% increase in mutton snapper spawning biomass and a seasonal closure of the Western Dry Rocks could be expected to yield similar results. Taken collectively, the GHOF believes that the FWC staff recommendations and a seasonal closure of the Western Dry Rocks will result in a healthier mutton snapper population, as well as more and bigger fish available to anglers.

Sincerely,

Dr. Guy Harvey, Ph.D.
Chairman
Guy Harvey Ocean Foundation



Guy Harvey World Headquarters
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www.GuyHarvey.com

Comment for the Record:

Snapper Grouper Amendment 41

My Name Is Vincent Bonura. I am owner of F/V GOIN' OFF. We primarily fish out of the Florida Keys. This is my comment for the commercial fishing side of Amendment 41.

Action 5- I would like to see **alternative 1 (no action)**. Keep the minimum size limit for mutton snapper in the South Atlantic region at 16 inches total length.

Action 6- Spawning season. The current May and June spawning season are the most accurate spawning months for mutton snapper. I do not want to see this changed. **Alternative 1 (no action)** is the most appropriate action.

Action 8- Modify mutton snapper commercial trip limit in the South Atlantic region.

Regular season- I personally would prefer **alternative 1 (no action)**, but if you absolutely must have a commercial trip limit, we (**traditional bandit boats**) need the largest trip limit available. Our trips are multiple days and we do not run back and forth every day to offload our catch. A minimum of 500 pounds (**sub alternative 2c**) is mandatory to make these trips economically viable.

Spawning Months- Once again we (**traditional bandit boats**) need the largest limit possible. We fish for multiple days and typically with only a one to four-man crew. I believe we should have a vessel/trip limit instead of a per person/day limit.

Also, as another individual mentioned during the public hearing webinar comments on August 6, 2016, that if that vessel is a dual permitted vessel holding commercial and charter head boat snapper grouper permits, it would only be allowed to have a maximum of four people aboard for a commercial trip. The per person/day rule gives some boats the advantage of bringing a larger "crew" out commercial fishing just to retain more fish.

Sub-alternative 3d- Twelve fish/vessel/day is your largest alternative for a vessel limit. I do not think this is enough fish and should be reevaluated for a larger number of fish or go for a pounds per trip instead.

RECEIVED

AUG 08 2016

South Atlantic
Fishery Mgmt. Council

Tight Lines,



Vincent Bonura

SailRaiser25C@aol.com

954-240-8615



International Game Fish Association

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June 20, 2016

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Dear FWC Commissioners,

The International Game Fish Association (IGFA) is a non-profit organization that represents recreational anglers throughout the world. IGFA was established in 1939, has active members in 162 countries, is the governing body for international recreational fishing, and provides rules for ethical angling practices. IGFA currently has more members in Florida than any other state.

IGFA urges the Commission to take a proactive approach to mutton snapper management by adopting the FWC staff recommendation of:

- Increasing the recreational and commercial harvest, and importation and sale minimum size limits to 18 inches;
- Reducing the recreational bag limit to three fish per person within the 10-fish snapper aggregate bag limit;
- Replacing the May through June commercial trip limit in all state waters with a three-fish per person per day limit from April through June in Atlantic state waters only; and
- Establishing a 300-pound commercial trip limit for the remainder of the year (July – March) in Atlantic state waters only.

In addition, the IGFA urges the Commission to take further action by closing the Western Dry Rocks during the mutton snapper spawning season (April-July). This area is small (1 square mile) but extremely significant as a spawning aggregation site for mutton snapper, black grouper and permit. A similar closure at Riley's Hump in the Dry Tortugas reported a 400% increase in mutton snapper spawning biomass and a seasonal closure of the Western Dry Rocks could be expected to yield similar results. Taken collectively, the IGFA believes that the FWC staff recommendations and a seasonal closure of the Western Dry Rocks will result in a healthier mutton snapper population, as well as more and bigger fish available to anglers.

Sincerely,

Jason Schratwieser
IGFA Conservation Director

The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.

Email: hq@igfa.org • Website: www.igfa.org

Tropical Anglers Club

6720 SW 39th Terrace

Miami, Florida 33155

Phone 305-595-3522

Aug. 26, 2016

To the Florida Fish and Wildlife Conservation Commission:

My name is Dale Walker. I am president of the Tropical Anglers Club of Miami. We are a light tackle and conservation-minded fishing club founded in 1953. As well as Miami's oldest fishing club, we are Miami's largest with 114 members and growing.

I as President, with the good graces of our members, have taken an interest in the mutton snapper workshops as we and many of South Florida's fishermen have a vested interest in the fish limits, fish populations and the general health of the fish and their environmental conditions.

At our meeting on 8-16-16 all members agreed on the following recommendations:

- We support an 18" minimum size limit for mutton snapper because we want the mutton snappers to have a greater chance to spawn.
- We also support closing off Western Dry Rocks near Key West for any bottom fishing during the spawning months (May, June and July), but would allow trolling for dolphin and/or other pelagic species in the Western Dry Rocks area during the proposed May-July closure.
- We agree that any other mutton snapper spawning grounds identified in the future should be closed through the May-July spawning months because we have seen the positive results personally as in the 400% increase in mutton

snappers due to the "Riley's Hump" closure in the Dry Tortugas. They are just too easy to catch during the spawn in these gathering areas.

- We support a 5- fish limit of mutton snapper per person per day within the existing 10 fish aggregate now in place year round. Our reasoning for a 5-fish limit instead of 3 is that it adds only a very small percentage of fish to the total mutton snappers harvested at an 18" minimum length, as opposed to the current 16" minimum length. This would allow anglers who travel far and put forth a greater effort with gas, time, money, etc. to harvest just 2 more fish each per day. These include lifelong fishermen such as us and many charter captains and fishing guides who have spent their lives fishing the waters of South Florida.

By allowing 5 instead of 3, we would still have a 50% reduction (as compared to 70% for just 3 per day). By allowing us to keep 2 more muttons at the 18" minimum size, you can give us a 20% increase in the amount of muttons that anglers can keep and not affect the fish populations so much. Please consider this change in light of its impact on the livelihoods and the families of the captains and guides who depend on these fish for a living and for regular fishermen such as our club members who put forth the extra time and effort to catch these fish.

- We offer the following co-proposal to the closing of Western Dry Rocks for bottom fishing in the May-July mutton snapper spawning period: Consider a possession limit of 2 days' bag limit for recreational anglers who voyage for two or more days to Fort Jefferson/Dry Tortugas. This would be easy to enforce since the National Park Service requires boaters/captains to fill out a registration card and pay a fee of \$10 per person. The card includes the name of the vessel, FL numbers and names of crew members. If the captain and crew decide to sleep on their vessel they have to stay in the designated basin/anchorage area or no more than a mile from the fort, so their presence is known to park rangers.

When we camp at Fort Jefferson we also have to fill out campsite cards with the group leader's name, the number of campers on the site and the site's location (they do check on you as well). Both registration cards are 2-part documents with receipt numbers for verification purposes. We put the info and money in envelopes, which are placed into lock boxes provided by the Park Service. FWC

may choose to require the boater/captain to photograph the documents for further verification.

A Dry Tortugas 2-day possession limit would earn support and cooperation for closing off Western Dry Rocks to bottom fishing during the spawning months. It is a way of giving something back to stakeholders without hurting the population of fish in the Dry Tortugas because there are more than enough fish to be caught there. Finally, fuel, food and bait purchases, ramp fees, trailer storage and lodging for such trips will benefit the economy of the Lower Keys, offsetting whatever might be lost because of spawning period restrictions.

We feel that proposal in particular is a win, win, win – for the mutton snapper, for you and for us.

We would see your favorable action on all these recommendations as a demonstration by you, the government, that you care about us and our lives and are willing to work with us. We believe our proposals are fair, reasonable and beneficial to the resources that you and we desire to protect.

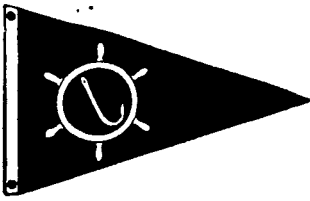
Please let your response demonstrate that we as fishermen and you as a government agency can work together and compromise on our beloved mutton snapper. We can set a prime example of government and its citizens working together and meeting each other in the middle for all to see so that all of us and the mutton snapper can benefit from our collective decisions.

Thank you for considering our input, and for FWC staff's encouragement.

Dale Walker, President

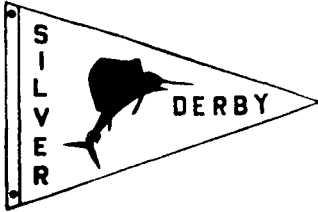
Tropical Anglers Club

Cell phone 954-868-2933



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.

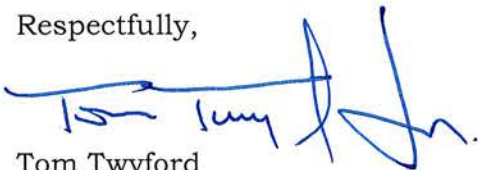
Notably, we do not see a dramatic increase in mutton snapper catches during the spring time spawning period. We are not aware of any significant spawning aggregations that anglers are targeting off the Palm Beaches. While some aggregations no doubt occur, they are very difficult to fish due to the strong 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,



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



November 10, 2015

Ms. 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 Director McCawley:

The American Sportfishing Association (ASA) appreciates the opportunity to comment on potential changes to mutton snapper management in the state of Florida by the Florida Fish and Wildlife Conservation Commission (FWC).

As the nation's recreational fishing trade association, ASA represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 46 million recreational anglers, over 3 million of whom reside in or visit Florida. ASA safeguards and promotes the social, economic, and conservation values of sportfishing in America, which result in a \$115 billion-a-year impact on the nation's economy and \$8.6 billion in Florida alone.

Mutton snapper are an important recreational species in South Florida, providing many opportunities for sport and table fare. While they are not currently overfished or undergoing overfishing, ASA supports a proactive approach for mutton snapper management to increase protection for this species, particularly during the spawning season. Because spawning aggregations are especially vulnerable to exploitation, taking action to address fishing pressures during this critical life phase can help avert potential adverse species' effects in the future. ASA encourages the development of a wide range of potential mutton snapper management options for FWC's consideration through an inclusive public workshop process.

ASA appreciates FWC's efforts to proactively address management of mutton snapper in Florida and looks forward to working together on this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Leonard", is written over a light blue circular background.

Mike Leonard
Ocean Resource Policy Director

AMERICAN SPORTFISHING ASSOCIATION

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