

Marco Sportfishing Club

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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 muttuns 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,

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