



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



July 19, 2021

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,

On behalf of the over 1,400 members of the West Palm Beach Fishing Club (WPBFC) I wanted to share our comments regarding goliath grouper. First, we commend the FWC on its management success in rebuilding the once severely overfished goliath grouper population. While we recognize that goliath grouper are not likely fully recovered, most observers agree they have been brought back from the brink thanks to the protections put in place by the FWC years ago.

The WPBFC does not support opening goliath grouper to recreational or commercial harvest at this time. If a specific number of animals need to be harvested to obtain critical biological data, then we would support such action. Especially, if those data aided decision makers with accurate information from which to make future policy. In our view a scientific harvest, if needed, should be highly managed by the FWC (perhaps in cooperation with knowledgeable guides/anglers) and limited to just the number of animals needed to capture the data that is being sought.

One concern the WPBFC has regarding goliath grouper (and other estuarine dependent species) is the current state of essential fish habitat, which has been severely diminished and in the near term appears to be degrading further. We believe the existing population of fish are more valuable than ever because the habitat that supports the recruitment of juvenile fish is dwindling rapidly. This is the primary reason the WPBFC does not support a harvest of sub-adult goliath grouper, even though they are more desirable table fare.

Another concern of ours is the fishes' behavioral vulnerability. Since goliath grouper inhabit easy to find wrecks, ledges, rock piles and jetties, and because they do not readily flee from divers and fishermen, they make easy targets, especially on a repeated basis. Combine this with advancements in angling technology like GPS chart plotters and side scanning sonars, the

publication of fishing locations, and the sheer increase in the number of anglers, and you have a recipe for over fishing. History has shown us just how vulnerable this species is to fishing pressure.

In our region, off Palm Beach County, goliath grouper are commonly encountered on near shore and offshore wrecks, and to a lesser extent near rock jetties and bridges. While there is some goliath grouper depredation occurring in our area, it is nothing like what we are currently experiencing with sharks. We do not believe goliath grouper depredation is a serious issue in our area at this time. In fact, some local fishing guides and anglers intentionally target the fish practicing ethical catch and release techniques with large circle hooks. The fish provide tremendous entertainment value and photo opportunities for anglers. This sustainable catch and release fishery is a popular attraction with some local charter operations.

Each fall season aggregations of goliath grouper can be observed on the shallow wrecks off our coast. Because of our excellent visibility, these predictable gatherings have become a boon to Palm Beach County's diving industry. People travel from all over the world to dive our waters and photograph these seasonal aggregations of fish. Notably, these tourists fill hotel rooms, book dive charters and stimulate the local economy in other ways during our 'shoulder season' when the business is needed most.

Because large goliath grouper have little food value, and may in fact be hazardous to eat due to high levels of mercury and/or ciguatera, we see no sense in harvesting them recreationally or commercially. Again, we are not receiving complaints from recreational or commercial fishers regarding goliath grouper depredation in our area. Furthermore, the WPBFC does not believe a limited recreational harvest will solve any depredation issues that may be occurring in other regions of the state. In our view, the value of this fish for catch & release fishing and diving interests are reason enough to maintain the current prohibition on recreational or commercial harvest.

Sincerely,



Tom Twyford
President

Cc: Pete Schulz, WPBFC Chairman
John Jolley, WPBFC Scientific Advisor
Shana Phelan, Pura Vida Divers/Palm Beach County Diving Association