

WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



March 24, 2023

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 West Palm Beach Fishing Club (WPBFC) I wanted to share our organizations comments regarding the FWC's proposal to create 10 management regions for snook. We commend and support the FWC on its focused strategy to conservatively manage snook. Despite persistent issues with water quality and habitat, snook populations have proved to be very resilient.

The WPBFC has concerns with the FWC's proposal to add new layers to snook management with the creation of 10 management regions. Here are our comments:

The FWC already has the option of using an Executive Order (EO) to close or to quickly modify regulations in the event of localized impacts from events like a severe Red Tide outbreak, toxic spill, seasonal cold kill, notable habitat loss, or other harmful events. We question the need to create new layers of management when this efficient tool, which is commonly used by the FWC to address many issues, already exists.

A point we wish to emphasize is that snook move. The WPBFC has been actively involved with snook research and tagging for decades. We have strong data that indicates snook move long distances. They don't respect boundaries. With snook already so highly managed, we do not see the need to establish different management regions. We are curious if FWC has done snook population estimates for each of the proposed regions, or if there is data that indicates snook decline in specific regions. If regional declines are occurring we are curious if fishing effort is the culprit, or rather issues related to habitat and water quality.

With 10 new snook management regions we question how efficient it will be to gather stakeholder input. This would become a very cumbersome and time-consuming process in our view reducing the FWC's management efficiency. We remain unclear how the process of

regional management rule review would work and how regional rule changes would be implemented in a timely fashion. Again, it all sounds very cumbersome compared to the way we are currently managing snook.

The proposed 10 snook management regions are not in alignment with the existing spotted seatrout and redfish management zones, which in our view is confusing. Furthermore, creating 10 snook management regions would potentially confuse those anglers who find themselves fishing on or near the designated boundary lines, especially, if size limits, bag limits or closed seasons were different in the two neighboring regions.

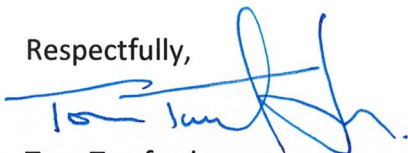
It has been our observation that new layers of management only serve to confuse an angling public who already has difficulty keeping up with ever changing regulations. Access to smartphone apps can certainly aid anglers in this regard. However, we believe it is wrong to assume that many Florida anglers have or use smart phones to stay up to date with fishing regulations.

While there are those who believe snook should be entirely a catch and release fishery, the WPBFC believes anglers deserve an opportunity to keep fish of legal size during open seasons. We believe the 1 fish per harvester bag limit is a fair way to allow access those who wish to keep a fish. The snook fishery is already almost entirely catch and release. Per the FWC Snook Regional Management presentation (February 2023), 99% of all snook caught are released on the Gulf coast and 96% on the Atlantic coast. The WPBFC does not support a total closure on snook, unless biological targets are not being met or if episodic events intervene such as severe Red Tide, toxic spills, cold kills, or other harmful impacts occur.

We have concerns and unanswered questions about enforcing new regional regulations. Do law enforcement boundaries match up with the proposed regions? Or will FWC Law Enforcement have to enforce two sets of regulations within their own territory?

Finally, we cannot say it enough that much of our focus needs to be on improving water quality and habitat, and increasing law enforcement coverage. Since snook fishing is already highly managed and is almost entirely all catch and release, we question the need for additional layers of regulations. It appears from our viewpoint that the FWC is creating more work for themselves. Please know that the WPBFC is a huge fan of the work FWC has done through the years, however we find ourselves in the unusual position of disagreeing with this proposal. We do not believe snook management regulations need to be altered at this time.

Respectfully,



Tom Twyford
President

Cc: Pete Schulz, WPBFC Chairman