



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



April 26, 2024

Jessica McCawley, Director
Division of Marine Fisheries Management
Florida Fish and Wildlife Conservation Commission
2590 Executive Center Circle E, Suite 201
Tallahassee, FL 32301

Randy Blankinship, Division Chief
Karyl Brewster-Geisz, HQ Fish Branch Chief
Highly Migratory Species Management Division
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

RE: Harvest of Little Tunny (Bonito)

Dear Jessica, Randy, and Karyl,

The venerable West Palm Beach Fishing Club (WPBFC) would like to make the Florida Fish & Wildlife Commission (FWC) and the National Marine Fisheries Service (NMFS) aware of an emerging issue that is of concern. Our members, who include active anglers and local fishing guides, often time notice trends taking place offshore that researchers and resource managers may not be aware of yet. For many decades Little Tunny (*Euthynnus alletteratus*), also known as Bonito, have been a reliable spring/summer season catch here offshore Palm Beach County. Their numbers have been so abundant in the past that they have been cursed by anglers targeting more desirable species. The area offshore Jupiter to Juno Beach has historically been the epicenter of summertime Bonito aggregations. This area has a unique bottom contour where the northward flowing current abruptly runs into a north eastward protruding reef that creates significant upwellings and current edges, which in turn attract all forms of marine life.

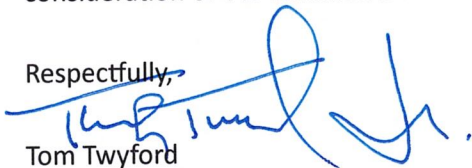
In recent years we have seen a notable decline in the local abundance of Bonito. There may be multiple explanations for this decline, and we are hoping researchers and additional stakeholder input can help. Perhaps, not coincidentally, we have seen a significant increase in commercial hook and line fishing for Bonito in our area. To be clear we do not want to prohibit commercial Bonito harvest. We recognize and value the role of small-scale commercial fishers, however like any other fishery the allowable catch

needs to be regulated to maintain a sustainable fishery for all. Currently, Bonito are considered an 'Unregulated' species so commercial fishers are taking all they can catch when the Bonito schools are present. Compounding the problem is that many of these commercial anglers are loading their live wells with small baits (menhaden, sardines, threadfin herring) each morning before heading offshore. The large quantity of live bait allows them to 'Live Chum' the bonito making their efforts highly effective. To be fair, live chumming is something practiced by some recreational anglers as well. However, commercial fishers who practice this technique are highly efficient at netting these chum baits and are doing so on a frequent basis. Water quality issues and loss of inshore/nearshore habitat has significantly diminished these baitfish, so the baitfish that are left are getting highly pressured by commercial fishers who are seeking Bonito.

The WPBFC is also concerned about the impact declining Bonito abundance will have on the shark depredation issue we have been dealing with for quite some time now. Fewer Bonito likely means there will be less forage for sharks resulting in an increase in depredation. It is hard to imagine that shark depredation could become worse than it already is, but further declines in Bonito abundance may have that result.

The WPBFC urges the FWC and NMFS to further investigate this issue. In our view the Bonito deserve to be managed. The FWC and NMFS need to be on the same page regarding any future Bonito regulations since the species is regularly caught in both state and federal waters. In our view it is important to 'get ahead' of an emerging issue like this rather than 'react' to the problem once it has occurred. The WPBFC believes that the Bonito's listing as an unregulated species is no longer appropriate considering what we are observing on the water. We encourage the FWC and NMFS to consider this Bonito issue at a future workshop where additional public input from stakeholders could be received to see if similar observations are being made. Bonito are critically important forage fish, tremendous game fish, and valuable to the commercial industry, therefore they should be treated as such with reasonable recreational and commercial catch limits that ensure a sustainable fishery for all. Thank you for your consideration of our comments.

Respectfully,



Tom Twyford

President

Cc: Pete Schulz

Capt. Scott Hamilton, Jupiter Fishing Guide

Capt. Butch Constable, Jupiter Fishing Guide

Ben Hartig, Commercial Fisherman & Past SAFMC Chair

Capt. George Labonte, Jupiter Fishing Guide