

WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



November 7, 2024

United States Department of Commerce
National Oceanic and Atmospheric Administration
NOAA Fisheries

Re: FB24-067 Request for Comment: Notice of Intent to Prepare an Environmental Impact Statement

To Whom It May Concern:

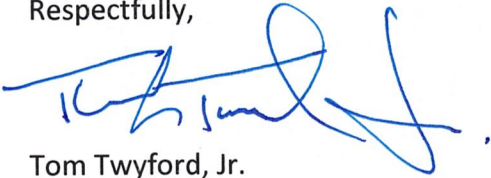
On behalf of the over 1,600 members of the venerable West Palm Beach Fishing Club (WPBFC) I would like to share our comments regarding NOAA's intent to pursue a Secretarial Amendment and prepare an Environmental Impact Statement that would circumvent the South Atlantic Fishery Management Council's (SAFMC) ability to regulate and manage red snapper. We do not envy the position NOAA is in, and we understand that because of the lawsuit brought against the agency that there is a sense of urgency to implement stricter regulations. However, our fear is that this is the first step towards arbitrarily implementing bottom fishing closures outside of the council process.

There has been little confidence in the data being used to manage red snapper. On the water observations by both commercial and recreational fishers are not in alignment with 'the best available science'. Additionally, there is currently no reliable federal recreational data collection system that can accurately determine how significant recreational discards are in the red snapper fishery. The WPBFC remains skeptical regarding the dead discard numbers currently being used in red snapper modeling. Furthermore, excellent strides are being made regarding educating the angling public on how to mitigate the impacts of barotrauma on all species of bottom fish using devices such as the SeaQualizer pressure activated release tool.

To be clear the WPBFC believes in the philosophy of "erring on the side of the resource first" which we support when the biological status of a species remains in doubt. It is a philosophy we emphasized several decades ago when the WPBFC presented a well thought out white paper to NOAA and the SAFMC on King and Spanish Mackerel management when those species appeared to be in similar disarray. The conundrum with red snapper is that most agree the data being used to model the status of the species is flawed.

Unfortunately, excluding the SAFMC from the management process will further alienate the angling public. While we recognize that some additional management action is likely inevitable to placate the lawsuit and end overfishing, we urge NOAA Fisheries not to take any drastic actions that would damage local economies. Taking an extreme measure such as a blanket bottom fishing closure would have catastrophic consequences on coastal communities, small businesses and charter fishing operations. Please consider alternatives other than 'bottom fishing bans' and let the red snapper rebuilding process continue. We hope NOAA Fisheries will cooperatively work with the SAFMC to collect more reliable red snapper data and find a sustainable management approach that is in the best interest of the resource and the angling public.

Respectfully,

A handwritten signature in blue ink, appearing to read "Tom Twyford, Jr.", with a stylized flourish at the end.

Tom Twyford, Jr.
Executive Director

Cc: Pete Schulz, WPBFC Chairman
John Carmichael, SAFMC Executive Director
Jessica McCawley, FWC Director of Marine Fisheries Management