

In the initial scoping period, the Lower Keys Guides Assc recommend that the Marquesas keys be managed as a Catch and Release Zone, with provisions for bait harvest. We felt this fit in well with the Goals and Objectives created by the SAC for this zoning process. Specifically, the objective of creating large non-extractive zones that contain a wide variety of ecosystems. The Marquesas area includes such a variety of ecosystems and receives little commercial fishing pressure. The only significant commercial use of the area is by catch and release sportfishing guides and their clients. The creation of a catch and release zone in the shallow water areas of the Marquesas would meet the SAC's Goals and Objective, while incurring little negative impact on the commercial use of the area. The Marquesas is one of the gems of the Keys, and deserves to be protected AND used.

In regard to offshore spawning sites, we would recommend creating no anchor zones, rather than closures, and pressure the FWC to create better regulations and seasonal harvest restrictions when required. No anchor zones at spawning sites during the spawn would significantly reduce harvest, while still allowing access. We understand that the Sanctuary is not in charge "fisheries management", but with some pressure on the FWC, new state wide harvest regulations/seasonal restrictions, coupled with a no anchor zone at spawning sites, could solve a complicated issue. Protection with reasonable access is better than total closures with significant financial impacts.

This process should be about finding a balance between protecting the ecosystem while still allowing commercial and recreational use.

John O'Hearn
LKGA president

I am unable to attend the Sanctuary meetings in June 2014 but wish to share with you my thoughts on regulating the harvest of mutton snappers.

I have been fishing the reef at Western Dry Rocks in deep water for 35 years and have caught many fish there. However, I have never condoned targeting mutton snappers during their spawn because it is self defeating -- good for immediate profit but bad for long term fishing. A recreational limit of 10 muttons per person versus 5 mangroves snappers seems absolutely ridiculous to me and of course has added to the decimation of the mutton snappers while spawning. The mutton limit is too high.

Since the closure of Riley's Hump off the Dry Tortugas, I have seen a positive difference in the amount of fish caught from the Marquesas to Rebecca. Therefore I know that carefully crafted fishing regulations are effective in maintaining and increasing fish populations. I urge you to act with due diligence and modify the rules that govern fishing for this species.

Please consider limiting the recreational catch of mutton snapper, at least during their spawn, to 2 to 4 fish per person. This would help perpetuate the species yet allow a limited catch of a desirable snapper. I vehemently oppose closed fishing zones in this instance because it would be difficult to enforce and would put too much pressure on fishing elsewhere. Likewise, the average fisherman cannot determine the difference between state and federal waters, as is evidenced in the grouper harvest locally.

Thank you for your efforts in behalf of our mutton snapper population!

Sincerely,
Capt Jim Thomas
V/F Tightlines FL3055LS

Position Statement

From: Bonefish & Tarpon Trust, The Florida KeysKeeper, Inc.

To: Florida Keys National Marine Sanctuary, Ecosystem Protection Working Group

Date: June 10, 2014

Habitat loss and degradation and overfishing are the top causes of fish population declines worldwide. These same threats are active in the Florida Keys. Given these ongoing threats, we commend the Florida Keys National Marine Sanctuary in their efforts to formulate a strategy aimed at conserving and restoring the habitats and fisheries of the Florida Keys. We strongly recommend, however, that these conservation efforts are based on the best available science, and that they take into consideration the characteristics of the user groups that utilize the natural resources of the Florida Keys.

Top among the user groups that requires special consideration is the Flats Fishery. The flats fishery is an iconic and core component of the Florida Keys culture, with roots going back to the 1930s, a history not shared by many modern-day activities. The fishery has a significant economic impact, especially relative to the environmental footprint: a recent economic study from Bonefish & Tarpon Trust estimated that the annual economic impact of the flats fishery exceeds \$465 million.

The flats fishery is entirely catch and release. In fact, Bonefish & Tarpon Trust, KeysKeeper, and flats fishing guides pushed for and helped create the regulations that made bonefish and tarpon catch and release only, and significantly tightened regulations for permit in the Florida Keys. Recent research has shown that bonefish and tarpon have high survival after release, indicating that catch and release is a viable conservation tool for these fisheries. Research on catch and release effects on permit has not yet been conducted, but anecdotal data suggest that survival of permit captured on the flats is high.

The flats fishery has low environmental impact. In addition to being a catch and release fishery, in which post-release survival is very high, the methods used in flats fishing are appropriate for habitat conservation. Fishing methods rely on using a push pole or electric trolling motor to maneuver the boat on the flats as the fishing guide and anglers search for bonefish, tarpon, and permit. Propeller scarring, anchoring, and other habitat damaging activities are uncommon.

The flats fishery uses a distinct and identifiable portion of the FKNMS. Bonefish & Tarpon Trust, The Nature Conservancy, Keys Keeper, and flats fishing guides recently completed a Fishing Areas Map for the flats fishery of the Florida Keys. This map identifies the areas in the Florida Keys upon which the fishery depends, and has been overlaid with habitat data which is designed to assist prioritization of conservation areas. This map was previously provided to the FKNMS through the *Shallow Water Wildlife and Habitat Protection Working Group*.

Based on the characteristics of the flats fishery and the scientific data available for the flats fishery, the FKNMS should view the fishery as a conservation tool. Specific recommendations are:

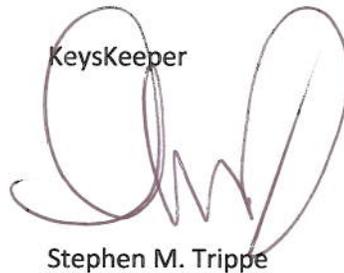
- Fisheries Protections

- Catch and Release should be applicable to No Take and No Extraction Zones. Since post-release mortality of flats species is ~~high~~ ^{Extremely low}, catch and release has negligible impact on these fish population. In addition, there is no harvest of bonefish and tarpon, and highly managed harvest of permit, so there are no population-level threats. Since catch and release is not a viable option for most species of concern in the FKNMS, a Catch and Release Zone will provide the same protections to these species of concern as No Take Zones. Moreover, Catch and Release Zones allow the economically important flats fishery to continue.
- Because of the methods used in the flats fishery, it should be considered a viable tool for habitat conservation. Flats fishing areas (see Fishing Areas Maps) deemed in need of habitat protection (e.g., to protect against propeller scarring, boat groundings) should be considered for designation as Pole/Troll/Paddle/Idle Zones rather than Exclusion Zones. These methods of propulsion will greatly reduce impacts to shallow habitats while simultaneously allowing economically important and environmentally responsible activities to occur.
- Habitat Protections
 - Speed restrictions should be employed in habitats and areas that are important to low-impact, traditional uses such as flats fishing. For example, Idle Speed or Pole/Troll/Paddle zones would provide for habitat protection, minimize disturbance of fishes, and would be an added safety measure to boaters. It is a reasonable conservation management tool to designate a network of appropriately sized Pole/Troll/Paddle or Idle Speed Zones and access channels that provide habitat and fisheries protections while simultaneously allowing access.
 - Sufficient Navigation Pathways should be included in zoning delineations to allow safe and responsible access to limited access areas (e.g., Pole/Troll/Paddle Zones). Pole/Troll/Paddle and Idle Speed zones should have a maximum speed of 5mph to ensure minimal disturbance to flats fishes and minimize habitat damage.
- Scientific justification and monitoring
 - For areas deemed of special importance by FKNMS, scientifically valid information should be provided to justify closures or limitations to the flats fishery.
 - For areas deemed in need of regulation, a scientifically valid monitoring system should be put in place. For example, logbooks can provide valuable data for evaluating the effectiveness of different zones. Bonefish & Tarpon Trust would be an appropriate science-based entity to conduct a logbook program if one is needed.

This management revision process will not likely be repeated for another 15 – 20 years, so a long-term view to the health of the flats fishery and flats habitats needs to be taken. It is our view that the low environmental impact and high economic impact nature of modern flats fishing is not only conducive to inclusion within the overall zoning approach of the FKNMS, but can be used as a valuable conservation tool aimed at conserving both fish and habitat resources of the Sanctuary.

Bonefish & Tarpon Trust

KeysKeeper

A handwritten signature in dark ink, appearing to read 'S. Trippe', with a large, stylized flourish on the right side.

Aaron Adams, PHD

Stephen M. Trippe

Director Operations

Director, The Florida KeysKeeper, Inc.

Bonefish Tarpon Trust