

June 7, 2022

Rodney Barreto
Chair, Florida Fish and Wildlife Conservation Commission
Farris Bryant Building
620 S. Meridian St.
Tallahassee, FL 32399-1600

Dear Commissioner Barreto:

I am writing in response to outreach by the FWC Staff seeking input from the diving community regarding recommendations on the disposition of catch and release fishing activities on the Goliath Grouper population in Florida. I thank you for the effort you and Staff have made to reach out to DEMA as the trade association for the recreational diving community. As you are aware, DEMA has hundreds of diving business Members, representing hundreds of thousands of recreational divers all over Florida, and we appreciate the opportunity to bring their voices together to comment on this issue.

We would be remiss if we did not take this opportunity to again voice our concerns about, and opposition to, opening a “limited harvest” of Goliath Grouper. The science does not indicate this is wise or warranted, and FWC’s own attempts at obtaining fishery data have not yielded information that would point to opening the harvest, regardless of the slot size limit or restrictions on the number of fish. The very limited amount of data coming from the proposed harvest program will not fulfill any useful scientific or stock assessment. Goliath Grouper remain “vulnerable” on the [International Union for Conservation of Nature \(IUCN\) Red List](#)¹. We hope the FWC will be cognizant of the damage being caused to the Goliath Grouper population, and to the diving businesses that bring tourism and residential dollars to the state as divers come to see this iconic animal. Instead of any harvest, DEMA strongly believes that Goliath Grouper should be given the same protections as Manatees, another slow-moving animal with high tourism value. Like Manatees, Tarpon and Bonefish, Goliath Grouper are both economically and ecologically more valuable alive, than if killed through fishing or other extractive activities.

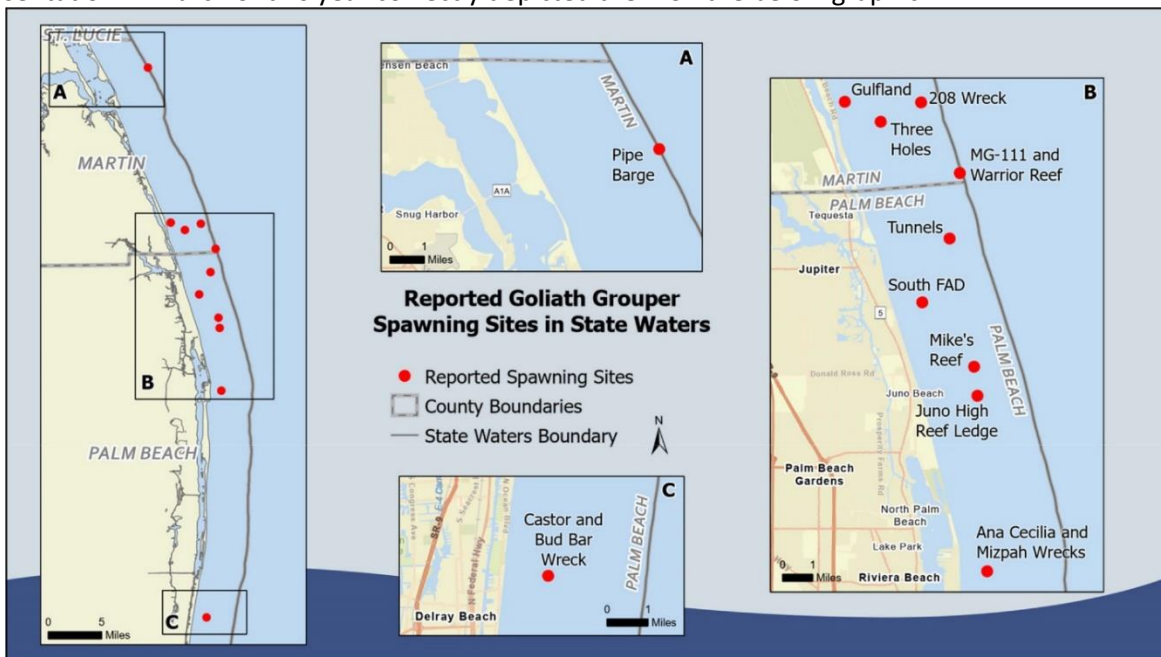
On the topic of Goliath Grouper catch and release, DEMA and the diving community are opposed to continuing this practice, particularly in the known spawning aggregation sites. While we appreciate that the FWC have instructed Staff to “explore gear restrictions as a possible method to reduce these potential impacts...” we remain strongly opposed to ANY catch and release activities targeting Goliath Grouper, especially in these KNOWN spawning areas. With all due respect to FWC Officers, who do “Yeomen’s Work” to enforce protection of Florida’s wildlife, given the limits to available resources we believe there is simply no possible way that FWC can enforce gear restrictions on fishers performing catch and release on these vulnerable fish. It is far too easy for those fishing in these spawning areas to claim they are not targeting this vulnerable animal, and additional losses of already vulnerable Goliath

¹ Bertoni, A.A., Aguilar-Perera, A., Barreiros, J., Craig, M.T., Ferreira, B. & Koenig, C. 2018. *Epinephelus itajara* (errata version published in 2019). *The IUCN Red List of Threatened Species* 2018: e.T195409A145206345. <https://dx.doi.org/10.2305/IUCN.UK.2018-2.RLTS.T195409A145206345.en>.

Grouper adults due to the physical damage caused by these “catch and release” activities is simply too risky to the population.

Regarding the concept of imposing gear restrictions, we know some in the fishing community have recommended handling restrictions, the prohibition of electric reels and wire leaders, and the use of such items as circle hooks for faster/easier release after hooking these animals. However, in our opinion, the real problem stems from injuring these fish as they are caught during “catch and release,” regardless of the gear being used. The known spawning sites are deep enough so that anytime a Goliath Grouper is hooked and brought TOWARD the surface (or all the way to the surface) there is going to be injury to the fish from barotrauma: injury caused by water pressure changes as the fish is hauled up from depth. This barotrauma almost inevitably includes damage to the fish’s eyes, and inflation of the fish’s swim bladder making it vulnerable to internal tissue and organ damage as well as to predation after release. Catch and release will also cause tearing of the animal’s mouth from hooks and fishing line, as well as many other potentially lethal injuries. Additional impacts due to displacement of animals during the catch and release process and removal from the spawning process are also likely.

The diving community in Florida has properly identified these known spawning sites, and the FWC presentation in March of this year correctly depicted them on the below graphic:



Given the limits to resources and the potential for damage to Goliath Grouper individuals as well as disruption of spawning activities and resulting damage to the overall population, DEMA and the Florida Diving Community recommend the following:

Prohibit ALL fishing activities, including catch and release fishing, within 1,000-feet of ALL known Goliath Grouper spawning sites in State waters from July 1 to October 31. This includes the following identified Goliath Grouper spawning sites:

- Pipe Barge near the northern end of Martin County;
- Gulfland, 208 Wreck, Three Holes, and MG 111/Warrior Reef near the southern end of Martin County;
- Tunnels, South FAD, Mike’s Reef, Juno High Reef Ledge, and Ana Cecilia/Mizpah between Jupiter and Palm Beach; and
- Castor/Bud Bar near Boynton Beach.

Proposed rules should also account for imposing 1,000-foot fishing prohibitions for spawning sites discovered/determined in the future.

As you know, Florida is home to hundreds of thousands of certified divers, with hundreds of retail and resort facilities that cater to the need of divers. As of 2020, Florida had the largest population of recreational divers of any state in the U.S. Always a desirable dive destination for international dive travelers, Florida far exceeded other dive destinations for U.S.-based dive travelers during the pandemic. One very important reason divers come to Florida and spend their money in this state is to see a Goliath Grouper in situ. It is critical that FWC protect this “vulnerable” species, thereby also protecting Florida dive businesses, hotels, restaurants, transportation services and other tourism-related businesses that depend, in part of Goliath Grouper.

Please prohibit catch and release activities targeting Goliath Grouper at known spawning aggregation sites by prohibiting ALL fishing within 1,000-feet of these known spawning locations.

Thank you for your careful consideration of this issue.

Sincerely,

Tom Ingram, President, and CEO, DEMA
Shana Phelan, Pura Vida Divers
Palm Beach County Diving Association
Lad Akins, Curator of Marine Conservation, Frost Science

cc: Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission
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