

January 23, 2021

Mr. Eric Sutton  
Executive Director  
Florida Fish and Wildlife Conservation Commission  
Tallahassee, FL

Dear Mr. Sutton,

Fly Fishers International has reviewed the Florida Fish and Wildlife Conservation Commission (Commission) proposal rule to close the Western Dry Rocks Spawning Area to fishing during a 2-month period to protect important game and other fish species during spawning. This is an important issue to our many members who enjoy fly fishing for species of fishes that spawn in this area. We do concur with the recommendations of the Bonefish Tarpon Trust (BTT) and recommend that the propose rule be amended to provide a 4-month closure of the Western Dry Rocks during the critical spawning period for the following reasons:

- Protection of spawning aggregations result in predictable outcomes of more abundant fish populations with a greater abundance of larger fish in the surrounding area.
- The largest trophy fish are the most vulnerable when spawning aggregations are fished, because they stay at the aggregation sites the longest. Large permit are also harder to land, making them more likely to be eaten by sharks. Fishing spawning aggregations takes away the trophy fish from our fishery. Trophy permit when left alone in their aggregations, return to their home areas and be available to target year-round throughout the Lower Keys.
- BTT tracked the spawning migrations of over 150 permit over the last five years, and identified several spawning sites for permit. Western Dry Rocks is the most important of these spawning sites. Approximately, 71% of the permit that were tagged on the flats in the Lower Keys went to Western Dry Rocks to spawn. BTT tagged 13 fish at Western Dry Rocks—10 of those fish returned to the flats in the Lower Keys.
- Though harvest for permit is prohibited in the Keys during the spawning season, predation on hooked permit at Western Dry Rocks is unsustainable. BTT further determined from two studies that 35% - 39% of permit hooked at Western Dry Rocks were eaten by sharks prior to being landed.

We especially thank the Commission for their continuing sound management and regulation of our very important sport fishery resources. We further thank you in advance for accepting and considering our recommendation that the Western Dry Rock Spawning Area be closed to fishing for a period 4 months.

Sincerely,

Tom H. Logan  
FFI Chairman, Board Conservation Committee  
FFI Board Chairman Emeritus  
Senior Advisor - Conservation