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# CCA FL



## Coastal Conservation Association Florida

October 27, 2011

Florida Fish and Wildlife Conservation Commission  
620 South Meridian Street  
Tallahassee, FL 32399-1600  
Attn: Ms. Kathy Barco, Chair

Re: Spotted Seatrout

Dear Commissioner Barco:

On behalf of CCA Florida's 8,000 members, I am writing to let you know that we strongly oppose the Commission's proposed changes to the spotted seatrout rules, particularly the addition of recent changes to the proposed rule. What began as a cautious opening on a restored fishery to provide some additional fish to the angling public has evolved into an opportunity for the development of a directed commercial fishery. Those amendments are:

1. Adding new commercial gear in the form of beach and haul seines with a "by-catch" of 75 fish;
2. Changing the commercial vessel limit from 75 to 150 fish if two licensed fishermen are on board;
3. Adding colder months to the commercial season which would allow exploitation by cast nets, and;
4. Year round commercial sale of seatrout.

CCA was encouraged and in support of the original plan regarding the opening of the closed months for the recreational public, but with the new additions to the proposed rule CCA would rather see no action taken by the Commission on seatrout than to see the Commission move forward with a full directed commercial fishery.

Seatrout are Florida's saltwater "people's fish", and the most accessible of all of Florida's saltwater gamefish. Now that seatrout are estimated to have reached the minimum management goal of 35% spawning potential ratio (SPR) in all 4 management regions of the state, even inexperienced families fishing from shore have a chance to catch a few and take the keeper size seatrout home for dinner. The hundreds of thousands of Floridians and out-of-state visitors who fish for seatrout realize invaluable recreational benefits, support tens of thousands of jobs and provide incredible economic value. The tremendous economic and recreational value of seatrout has been recognized by the states of Texas, South Carolina and Alabama, who have accorded seatrout "no-sale" status, and by the state of Georgia, which imposes the same size and bag limits on commercial fishermen that apply to the general public. Unfortunately, the Commission seems to think that increasing the take of seatrout by commercial fishermen is a good idea.

The numbers of seatrout are just now reaching the Commission's minimum management goal of 35% SPR (although just barely in the NW region), 15 years after it took public passage of the constitutional net ban against commercial gill netting to restore their numbers. The Commission seems to have taken the achievement of this minimum goal as a signal that it would be wise to allow an increase in the commercial take of seatrout. Given the enormous economic value and number of jobs attendant to the recreational seatrout fishery, it is difficult to understand this line of thinking.

Many generations ago, government officials and wildlife managers in this country decided that our natural, wild resources like largemouth bass, deer, turkeys and waterfowl would be best managed for the use of enjoyment of the general public. Indeed, past Commissioners have made the same decision for saltwater fisheries like snook, redfish, tarpon, and bonefish. The same is true with respect to seatrout in the states of Texas, South Carolina, Georgia and Alabama. Why is this Commission going in the other direction on seatrout?

The long awaited arrival of seatrout to reach its minimum management goal of 35% SPR, due in large measure to the patience of the angling public and its voluntary adherence to size and bag limits, is to be celebrated. But it should not be taken as a green light to expand the commercial take of seatrout. The increase in the number of months of the commercial season, the use of beach and haul seines, the allowance of huge amounts of seatrout take as "by-catch", and the rest of the benefits being proposed for the commercial fishermen are all simply bad ideas, not only from an economic/jobs perspective but also from a policy perspective. From an economic/jobs/recreational viewpoint, the better course in the long term would be to expand the allowable season for seatrout - and perhaps expand size and bag limits - for the angling public, rather than allowing increased significant take and sale by commercial fishermen.

The numbers of jobs and economic value associated with recreational seatrout fishing in Florida - from guides, to bait and tackle shops, to hotels, restaurants and gas stations - clearly indicate that promoting more recreational angling for seatrout, and not more commercial take of seatrout, is the wiser course. The members of CCA Florida urge the FWC to follow the lead of adjoining states in doing so.

In closing, we urge the Commission to oppose and remove the amendments that we identified. Ultimately, the members of CCA Florida, while encouraged by the removal of recreational closed months, believe that the FWC would better serve the citizens of Florida by making no changes to the current management scheme for seatrout than it would be by making any of the changes currently on the table.

Sincerely,



Don Roberts  
Chairman  
CCA Florida

**Coastal Conservation Association Florida**  
**Dedicated to Conserving and Protecting Florida's Marine Resources**

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