

January 31, 2020

Eric Sutton, Executive Director
Florida Fish and Wildlife Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399-1600

Re: Biscayne National Park Fisheries Management Plan

Dear Executive Director Sutton:

On behalf of the National Marine Manufacturers Association (NMMA), we welcome the opportunity to provide comments regarding the proposed Biscayne National Park fisheries management plan (FMP). NMMA supports the collaborative approach taken by the FWC and the National Park Service which includes a comprehensive set of guidelines to ensure a sustainable balance of fishing and natural resource protection with robust public access.

By way of background, NMMA is the largest recreational marine industry trade association in North America. Our nearly 1,400 members represent boat, engine, accessory and trailer manufacturers and collectively produce eighty percent of marine products sold in the U.S. Recreational boating is a major contributor to the U.S. economy with \$170 billion in annual economic impact; supporting 35,000 marine businesses and 700,000 employees. Florida is the largest boating state in the country with an economic impact of \$23.3 billion.

The recreational boating industry considers these fisheries management decisions to be critically important. Seventy percent of all boat outings involve fishing. Fisheries decisions and aquatic environmental conditions have a direct and cascading impact on the marine industry, including the ability of businesses to expand and customers to get out on the water. NMMA supports the objectives of this proposed plan which rebuilds and conserves fishery resources within Park waters while also ensuring robust visitor access.

As you are aware, Biscayne National Park (BNP) is the nation's largest recreational marine park in the National Park System. Located off the coast of Miami, Florida, Biscayne National Park draws visitors from throughout the metropolitan area, Florida, and world. National parks should be maintained for the use and enjoyment of the American people. The recreational community applauds the efforts of the National Parks Service and FWC for working together to develop a robust fisheries management plan that increases the aggregate bag and size limits for certain species while allowing for continued access of angling and boating visitors.

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Specifically, NMMA appreciates the opportunity to provide comments on the following proposed changes.

1. Impact of Proposed Fisheries Management Plan on General Management Plan
2. Size and Bag Limits
3. Coral Reef Protection Areas
4. Trap Free Zone
5. No trawl Zone

1) NMMA fully opposes the implementation of the marine reserve as finalized in the 2015 Biscayne National Park General Management Plan (GMP). During the course of that planning process, NMMA consistently raised concerns about the lack of scientific evidence to support a 10,000-acre closure and the availability of less draconian methods to address fisheries management challenges. By contrast, this proposed plan, appropriately involves both state and federal management agencies, is backed by sound fisheries science, and balances needed conservation reform with public access. Further, the proposed FMP is a superior plan for sustainable fishing and natural resource protection because it looks at the entirety of the Park ecosystem rather than a targeted subsection. For these reasons NMMA encourages moving forward with the proposed Fisheries Management Plan, including periodic review periods to ensure the efficacy of the fishing restrictions. While this plan is in effect, implementation of the marine reserve should be paused, allowing for likely ecological adjustments.

2) Size and bag limits based on scientific evidence, with regular periods of review are sound and appropriate fisheries management tools. The plan addresses ten major finfish, increasing the existing minimum size limits by 20% and establishing new limits on fish such as grunts, which currently lack size limits. Additionally, the plan establishes an aggregate ten fish limit on major finfish to achieve a 20% increase in species abundance. We support the proposed finfish species limits, while more restrictive than current rules, as it appropriately balances conservation and access with sound scientific basis. Anglers need healthy and abundant fisheries to recreate and these policies help ensure fish stock for generations to come and appropriate trophic abundance.

3) NMMA supports the establishment of five new Coral Reef Protection Areas (CRPAs), as they appropriately allow for the continuation of hook and line fishing, as well as boating. These areas provide sensible protection from trap and lobster harvest-related damage in some of the most sensitive ecological parts of the Park. Additionally, the overall CRPA area encompasses only 1.29 square miles, providing a targeted management approach. NMMA supports efforts to protect the natural coral reef and the recognition that fishing and boating are not direct or singular contributors to coral reef degradation.

4) In addition to the CRPAs, this plan identifies a trap-free zone near the Biscayne National Park Visitor Center. NMMA recognizes that the area around the Park's headquarters is a high traffic zone. While this area already prohibits the activity of lobstering, the measure will lower stress on the environment, promote safe access, and reduce user conflict.

5) Lastly, the proposed plan establishes a no-trawl zone within a portion of the Park as a means to conserve seagrass and hardbottom nursery habitats. This measure will provide reasonable protections for fish and invertebrates as well as reduce the likelihood of bycatch. NMMA supports this proposed rule; as it continues to provide reasonable boating and fishing access with minimal displacement, while providing protection for these vital habitats.

The recreational community applauds the efforts of the National Parks Service and FWC for continuing to maintain a high degree of transparency and stakeholder involvement as this robust fisheries management plan is formed. We hope that FWC will vote approve this plan and ensure that staffing and law enforcement resources are aligned to execute the plans' objectives. We greatly appreciate the opportunity to comment on these draft regulations and look forward to working with both agencies to ensure boater compliance. Please contact me at nvasilaros@nmma.org or Lee Gatts at lgatts@nmma.org with any questions or concerns you may have.

Sincerely,



T. Nicole Vasilaros, Esq.
Senior Vice President, Government and Legal Affairs
National Marine Manufacturers Association

CC:
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