January 12, 2011

Mr. Rodney Bareto, Commission Chairman
Florida Fish and Wildlife Conservation Commission
620 South Meridian
Tallahassee, Florida 32399-1600

RE: Redfish Regulations

Dear Commissioner Bareto:

The Florida Council of the Federation of Fly Fishers (FFF) has reviewed the staff recommendations that will be presented to the Florida Fish and Wildlife Conservation Commission (FWC) during their regular meeting in February 2011 to change harvest regulations for redfish, and we provide the following comments.

The FFF is comprised of more than 700 Florida and 11,000 international members, many of whom enjoy fishing for the redfish with the artificial fly. The redfish is considered by our members to be a very important and sought-after game fish, and we continue to support and applaud the FWC in their management and conservation efforts for this species of high recreational importance. Redfish numbers and sizes generally appear to be increasing state-wide while recreational demands also continue to increase.

It is our understanding that while other regulations will remain unchanged for redfish, staff will recommend the establishment of four new management zones for the species and an increase in bag limit of from 1 to 2 fish that may be taken within the proposed northeast and northwest management zones. These recommendations to relax take regulations for the species in the two north management zones is based upon population data indicating that redfish population numbers may now exceed a statewide management goal of a 40 percent escapement rate within those management zones. While it does appear that redfish populations now exceed the management goal in north-east Florida, the increase is not near as great for northwest Florida. Regardless, an increase in bag limit for redfish, whether biologically justifiable or not, will not necessarily increase fishing opportunity or the enjoyment of fishing for redfish as a trophy species in Florida.

The FFF has for many years advocated “catch and release” fishing, use of barbless hooks and safe handling of fish for release by all fishermen. Clearly, all fishermen do not “catch and release” as a common practice, and those that do enjoy the opportunity to keep an occasional legal fish for the table. The important point is that a two fold increase in bag limit for redfish in north Florida will not necessarily translate into greater fishing opportunity or enjoyment, but it definitely will result in an increase in harvest rates in those areas. A healthy, robust and growing redfish population is of much greater importance to our member’s fishing enjoyment than would be the opportunity to “kill” more fish. A continuation of current management and harvest regulations are in the greatest conservation interests for redfish and recreational fishing for the species in Florida. Perhaps most importantly, we are not aware of any overwhelming demand that has been expressed to the FWC to relax harvest regulations for redfish. Therefore, the FFF opposes the establishment of four management zones for redfish, which also do not appear biologically justified nor would they be necessary with the state-wide bag limit maintained at 1 redfish. This would not preclude stratifying the state for data analysis purposes without need of a regulation change. Most importantly, we oppose an increase of bag limit for the species in north Florida.

We close by reiterating our support and appreciation of the management efforts the FFF has maintained with successful results for the redfish. Specifically, we continue to endorse a state-wide bag limit of one redfish, a 12-month open season and no commercial harvest of the species. We oppose the staff recommendation to establish the four new management zones that will facilitate differing management and regulation strategies, and their recommendation to relax harvest restrictions by increasing the bag limit from 1 to 2 redfish in the two proposed north Florida management zones.

We thank you very much for the conservation work the FWC does on our behalf, and we appreciate this opportunity to provide comments regarding this important staff recommendation.

Sincerely,

William T. Gunn, Jr., President
Florida Council of the Federation of Fly Fishers

cc: Commissioners
Federation of Fly Fishers, National Office
Mr. Tom H. Logan, Vice President of Conservation