



July 24, 2019

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

Via email: Robert.Spottswood@myfwc.com

Dear Commissioner Spottswood:

I am writing to express concern on behalf of Florida's recreational diving community regarding the FWC Staff's proposed 2019 Fisheries Management Plan for Biscayne National Park.

As you may recall, the Diving Equipment and Marketing Association (DEMA) is the international trade association for the recreational scuba diving and snorkeling industries. DEMA has more than 1,400 business members worldwide, more than 300 of which are in Florida. DEMA represents the interests of diving manufacturers, diver training organizations, the diving-related magazines and media, diving retailers and dive travel and dive charter operators, as well as diving consumers. We are very proud that Florida is home to thousands of certified scuba divers, with thousands more traveling to Florida each year to enjoy its coastal resources.¹

DEMA shares the FWC's goal of taking steps to improve the size and abundance of the fisheries in Biscayne National Park (BNP). That is why we have worked alongside NOAA on similar attempts at managing marine resources in the Keys, the Dry Tortugas, and in other locations around the country. Importantly, the approach by managers with whom we have worked has been to look at all users of the sanctuary and adopt protocols which treat each user fairly and equally. After reviewing the BNP proposal, DEMA is highly concerned about FWC's 2019 Fisheries Management Plan, especially the staff [recommendation that spear fishing and the two-day lobster mini-season be eliminated in the Park.](#)

As I am sure you are aware, the 2019 FWC plan includes no data to corroborate the need for restricting either spear fishing or the two-day lobster Mini-Season. This was the same conclusion reached when this was last studied in 2014.

¹ DEMA also produces the annual DEMA trade show which will be held in Orlando, November 13-16, 2019. DEMA Show brings more than 10,000 diving professionals to the state to conduct business, and many stay after the four-day event to dive in Florida's gulf, fresh water springs and ocean, including in Biscayne National Park (BNP). DEMA's mission is to bring businesses together to grow the diving industry worldwide, and our goals include promoting recreational scuba diving and snorkeling, while at the same time protecting the underwater environment and its countless marine species.

Recreational diving is not an inherently “extractive” activity. DEMA contends that eliminating ALL extractive activities and restoring the Park’s Fisheries – including elimination of hook and line and commercial fishing – is a more equitable and long-term solution to both the fishing and diving communities than targeting the elimination of diving-related activities, while continuing to permit overfishing. Allowing access to recreational divers and snorkelers in the Park, while prohibiting all extractive activities is similar to but more restrictive than that outlined in [FWC’s 2014 Fisheries Management Plan, Alternative 5](#) and similar to the situation created within the 10,500 acres of no-harvest marine reserve already contained within BNP, which allows recreational diving, snorkeling and boating. According to FWC’s own 2019 BNP presentation, it is fishing pressure, along with pollution caused by proximity to urban areas, reduced water quality, and marine debris that is cited by FWC as the reasons for concern in Biscayne National Park.

Importantly, if FWC continues to permit hook and line fishing as in their current Fisheries Management Plan, **DEMA holds that spearfishing and the lobster Mini-Season should also be continued and permitted.** DEMA opposes placing the burden of Biscayne National Park’s recovery on divers, when fishing is allowed to continue, in light of FWC’s own environmental recommendations to take more prohibitive measures.

Thank you for your consideration of this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ingram", with a stylized, flowing script.

Tom Ingram
President and CEO

cc: Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission
Ms. Jessica McCawley, FWC
Bob L. Harris, Esq., Tallahassee
DEMA Board of Directors