



Salt **STRONG**

ALL FLORIDA 

February 16, 2023

Dear Chairman Barreto and Members of the Commission,

The Skyway Fishing Pier State Park is one of the most accessible piers in the state and a great place for people to participate in the sport of fishing. Those without boats, those with mobility issues and those with special mobility equipment can all access the pier and take part in the sport. Unfortunately, the Skyway Pier is an unusually hot spot for angler-pelican interactions because of its location near pelican breeding colonies, height, proximity to a closed bridge remnant that attracts resting and roosting birds, and the seasonal influxes of both pelicans and anglers that fish at this site.

Recently, a number of stakeholders met with FWC staff as a working group to attempt to build consensus on how to reduce pelican interactions and entanglements at the Sunshine Skyway Fishing Pier. As one might expect, this was a challenging task given the inherent contention surrounding the issue. While most of the angler representatives were reticent to reduce fishing opportunities, all recognized the need to reduce pelican interactions at the Skyway Pier and worked in good faith with other stakeholders participating in the meeting to arrive at solutions. This letter outlines potential avenues for compromise for near-term FWC rulemaking that emerged from the discussions and are supported by the undersigned organizations. However, we recognize this issue will require both near and long-term strategic measures, many of which likely do not involve rulemaking, to achieve the goal of reduced pelican interactions while maintaining angling opportunities.

Recommendation #1: From December through February, require that hook and line gear used at the pier be rigged with no more than one, single (non-multiple) hook per line.

This would prevent use of sabiki rigs, chicken rigs, multiple hooks, treble hooks, or lures with more than a single hook during these months. Although this will limit anglers' ability to fish for

bait at the pier, we believe a December through February seasonal restriction on these gears is a reasonable compromise to reduce negative interactions with pelicans. Information presented by FWC staff at the stakeholder meeting and public workshop held on January 25 indicated that entanglements at the Skyway Pier are most commonly associated with these gears and estimated average entanglements peak during these months. Given that anglers may now need to use these gears to catch bait at other locations immediately before heading to the Park to fish for their target species, we ask that anglers be allowed to possess multiple hooks/rigs in vehicles at Skyway Fishing Pier State Park.

We do not support the staff recommendations presented at the January 25 public workshop to also restrict use of these gears during November and March, or to prohibit use of sebiki rigs year-round on the north end of the south pier because they would unnecessarily limit fishing opportunities at the Skyway Pier. Data presented by staff at the public workshop indicate that November is one of the lowest months for entanglements and prohibiting use of this gear during March would prohibit Skyway Pier anglers from fishing for mackerel when these fish are locally available during the spring run. The water depth and close proximity to the channel make the north end of the south pier one of the most prized shore-based sites in the state to catch both bait and food fish. Eliminating use of sebikis year-round at the north end of the south pier limits prime fishing opportunities without addressing the underlying issue of pelicans being attracted to adjacent old bridge remnant.

Recommendation #2: *Year round, limit anglers to use of no more than two sets of hook and line fishing gear that must be within easy reach while fishing from the Skyway Pier.*

This would reduce the number of lines in the water, which should reduce pelican entanglements, while allowing anglers to continue to target multiple species while fishing at the Skyway Pier. Requiring that gear being fished stay within easy reach ensures lines are being actively tended, which may reduce negative interactions and entanglements. We recommend that additional rods and sets of hook and line gear be allowed to be stored in vehicles on the Pier, so long as no more than two are fished at a time. This will allow anglers to follow the best fishing practice of tailoring their gear to target species.

Recommendation #3: *Implement the gear restrictions above for a two-year period as a short-term measure while allowing additional opportunity to explore other regulatory or practical solutions, such as use of deterrents.*

During the two-year period, we encourage FWC to study the degree of interactions and estimates of pelican entanglement mortality at the Sunshine Skyway Fishing Pier relative to pelican populations. We also urge the FWC to work cooperatively with the Florida Department of Environmental Protection, the Florida Department of Transportation, and the park concessionaire to explore and provide a report on deterrent measures, such as hazing, modifications to the pier itself (including hanging ropes in a curtain-like fashion), and deconstruction of the adjacent closed bridge remnant. The report should include the expected reduction of angler-pelican interactions of each measure, along with the associated cost.

Recommendation #4: *Implement a mandatory pier fishing education course and associated no-cost permit for Skyway Fishing Pier anglers, similar to the shore-based shark fishing permit.*

Providing education and resources to anglers at the Pier on what to do if seabirds are accidentally hooked in lines and best practices for avoiding entanglements is vital to protecting anglers and birds. We believe the shore-based shark fishing educational module and permit provides a model for this educational approach.

We offer these recommendations as a step in the right direction that reduces angler interactions with pelicans while providing time to explore additional effective alternatives and long-term solutions. We look forward to working with FWC staff and other agencies to continue to improve outcomes for both pelicans and recreational anglers at the Skyway Fishing Pier State Park.

Sincerely,

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