



August 8, 2025

Chairman Rodney Barreto  
Florida Fish and Wildlife Conservation Commission  
620 S. Meridian St.  
Tallahassee, Florida 32399

**Re: Proposed Rule Changes:**

- **68A-12.012 and Associated Rule Changes – Re-Establishing a Black Bear Hunting Season**
- **68B-7.002 and 68B-7.008 – Protections for Bonefish Pre-Spawning Aggregation in Biscayne National Park**

Dear Chairman Barreto and Commissioners,

Thank you for the opportunity to comment on the Florida Fish and Wildlife Commission's proposed rule amendments. We thank you for voting favorably on the proposed re-establishment of black bear hunting in Florida during the May 2025 Commission meeting, and we ask that you please vote favorably on final approval of the black bear hunting rule. However, while we fully support managing for healthy bonefish populations and implementing protections, where necessary, we do have concerns that the proposed seasonal closure to all fishing in the newly discovered bonefish pre-spawning area could be premature.

Founded in 1989, the Congressional Sportsmen's Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

*Re-Establishing Black Bear Hunting (68 A-12.012 and Associated Rule Changes)*

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The data provided by FWC staff supports a highly regulated harvest of black bears within the proposed East Panhandle Bear Hunting Zone, North Bear Hunting Zone, Central Bear Hunting Zone, and the South Bear Hunting Zone. The FWC is the entity best equipped to address fish and wildlife management issues in Florida, and hunting is the best management tool for maintaining wildlife populations at a level that minimizes human/wildlife conflict while also ensuring their continued sustainability. CSF strongly supports the proposed rule changes as they are a testament to the sound conservation work that the FWC has undertaken to re-establish healthy populations of black bears to the point where a hunting season can even be considered. Establishing a hunting season for this iconic species will increase its value to the public, incentivize private landowners to conserve and manage critical wildlife habitat, and further the state's efforts to maintain well-balanced, genetically diverse populations.

*Protections for Bonefish Pre-Spawning Aggregations in Biscayne National Park (68B-7.002 and Associated Rule Changes)*

It was exciting to learn of the recent discovery of a bonefish pre-spawning aggregation in Biscayne National Park. Florida's bonefish, which is exclusively a catch-and-release fishery, is an iconic species of immense economic and cultural value to the state. However, the current trajectory of increasing abundance of Florida's bonefish populations inherently questions the need for a seasonal closure to all fishing activities due solely to the discovery of an existing pre-spawning area. The proposed action seems to be based primarily on an assumption that fishing pressure in the newly discovered area could lead to lower future recruitment, which is merely a hypothesis at this point.

That said, we appreciate the updated proposed rule that shortens the closure timeframe considerably from what was initially proposed. While we have questions relative to the need for any action at this point, we are not opposed to moving forward with the rule given the sunset provision, provided that, during the five-year period prior to the sunset, quantifiable information is collected to effectively evaluate the efficacy of the rule as it relates to the population level benefits of bonefish in Florida. If the closure to all fishing is not found to have significant population level benefits, we trust the FWC will consider removing the closure at that time.

Thank you for considering our comments, and please feel free to contact us for further information.

Sincerely,

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