



August 22, 2023

**RE: Redfish Notice of Intent to Modify Red Drum Size and Bag Limits**

Dear Mr. Adriance:

The American Saltwater Guides Association (ASGA) is a coalition of conservation-minded fishing guides, small fishing-related businesses, and private anglers who believe in the concept of “Better Business through Conservation”. The healthier the resource, the more economic opportunity it will provide. ASGA recently expanded to the Gulf of Mexico to answer the needs of the guide community, that rely on an abundant population of redfish. We support the best available science and are committed to being a valued stakeholder in the management process.

Last year, the Louisiana Department of Wildlife and Fisheries (LDWF) produced the [Assessment of Red Drum \*Sciaenops ocellatus\* in Louisiana](#). We applaud LDWF for comprehensive and robust science that provides a road map to recovering redfish to their once incredible abundance.

The assessment found that overfishing is occurring, and the Escapement Rate has fallen to 20.1% while the target rate is 30%. This is the lowest recruitment the state has ever seen. Most concerning is the Spawning Potential Ratio, the amount of sexually mature females in the resource, is expected to fall below the target around 2025. Poor recruitment combined with far too liberal bags limits caused the stock size estimates to plummet from a high of 23 million fish in 1999 to only 8.7 million in 2021. Our members and the economy of Louisiana depend on an abundant population of redfish. The situation is becoming dire.

LDWF has suggested a 35% reduction in harvest to address this situation. This level of reduction is projected to end overfishing within six years. However, it will take 30 years to rebuild SPR. The longer the recovery, the greater the uncertainty. Most management plans seek a ten-year rebuilding plan for this reason. A 30-year timeframe for rebuilding the population of adult redfish is condemning the resource to a bleak future for over a generation of fishermen. We do not blame LDWF for not suggesting a more aggressive approach. 35% represents what may be able to pass. We believe Louisiana redfish deserve more.

On July 6<sup>th</sup>, 2023, our members attended the Louisiana Wildlife and Fisheries Commission monthly meeting to voice their concerns over the proposed 35% reduction in harvest. A 55% reduction would rebuild SPR almost 20 years faster. Our members made their case and much to the credit of the Commission, the proposed NOI was amended to include a 55% reduction. ASGA strongly commends the Commission and supports this NOI.

Louisiana is widely regarded as the second to none redfish experience. This year-round, world-class fishery is an enormous economic engine for the state and a much-needed boost for some of the coastal Parishes that need it the most.

Redfish in Louisiana have the lowest recruitment on record, overfishing is occurring, and at best a 13-year period before SPR is at target levels. The difference between a recovery by 2050 and one by 2033 is just

a few inches off the current slot. Every moment that is wasted exacerbates the issue thereby making the end goal more difficult to attain. The time is now to support this NOI, the Commission, the resource, and begin the recovery of this iconic species.

Sincerely

A handwritten signature in black ink, appearing to read "Tony Friedrich". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tony Friedrich  
Vice President and Policy Director  
American Saltwater Guides Association  
[tony@saltwaterguidesassociation.org](mailto:tony@saltwaterguidesassociation.org)  
(202) 744-5013