



April 25, 2026

Mr. Jake Edwards
U.S. Army Corps of Engineers
Jacksonville District
701 San Marco Blvd.
Jacksonville, FL 32207

Re: Support for Florida Aquatic Invasive Species Cost-Share Program

Dear Mr. Edwards:

On behalf of the American Sportfishing Association (ASA), I write in strong support of the U.S. Army Corps of Engineers' proposed changes to the Florida Aquatic Invasive Species Cost-Share Program. We appreciate USACE's effort to modernize this program and update the existing cost-share framework with the Florida Fish and Wildlife Conservation Commission (FWC). As outlined in the draft Integrated Letter Report and Programmatic Environmental Assessment, this proposal would build on existing efforts to address nuisance plants by expanding to include aquatic invasive animals, while authorizing additional management tools to better meet fisheries management and conservation goals.

ASA is the trade association representing the nation's recreational fishing industry, including manufacturers, retailers, wholesalers and guides. In Florida alone, over 5 million resident and nonresident anglers fish annually, generating an \$11.1 billion economic impact that supports over 70,000 jobs. Additionally, federal excise taxes collected under the Dingell-Johnson Sport Fish Restoration Act on the sale of sportfishing equipment and marine fuel provided \$17 million to FWC to support conservation and fishing access in Fiscal Year 2026.

The spread and establishment of aquatic invasive species (AIS) threaten this significant economic impact. In Florida, aquatic invasive plants and animals degrade aquatic ecosystems and fishery productivity, reducing angler success and participation. Simultaneously, AIS obstruct boating access, fouling engines and intakes and impeding navigation. The impacts of AIS additionally extend beyond recreation, creating recurring maintenance burdens for public waterways and infrastructure. As acknowledged in the report, AIS pose significant threats to recreational fishing, boating and the businesses and communities that rely on them.

The updates to the Army Corps and FWC's joint program, as proposed in the report, are a positive step towards preventing, mitigating and eradicating aquatic invasive species. The report proposes to expand the program from its current focus on aquatic invasive plants to encompass invasive fish and animals that similarly impact Florida's waterways. It also introduces greater flexibility through annual work planning and a broader suite of eligible tools, allowing managers to prioritize high-risk waters and respond more quickly to emerging infestations. The proposed changes would enable a more flexible, adaptive management framework better suited to changing conditions and management realities.

The LR/PEA describes the value of moving from reactive containment to proactive suppression and maintenance control, containing AIS outbreaks before they become sufficiently established to impair waterway function, habitat health and public access. This focus on prevention, adaptive rapid response and proactive management can help mitigate the need for costly, long-term control and management commitments. Additionally, the program's emphasis on state-led implementation ensures that FWC, as the agency leading the science-based management of Florida's aquatic resources, receives adequate support to conserve aquatic ecosystems and expand fishing opportunities. The report noted that the proposed agreement would use a 50 percent federal cost share to reimburse FWC and other non-federal activities, ensuring federal funding is deployed through the state agency with operational experience, local expertise and capacity to act strategically.

Finally, ASA's support for this program reflects the recommendations and approaches highlighted by the Aquatic Invasive Species Commission. The Commission, which convened fishing, boating, and conservation partners, met with policy experts, leading scientists and state and tribal representatives to recommend the modernization of federal law and policy, increased federal-state coordination and an emphasis on prevention and rapid response. This program and partnership are a strong example of federal-state collaboration on shared waters, reinforcing, sound, science-based AIS management that will support the health of aquatic ecosystems, expanding recreational fishing and boating opportunities.

Thank you for the opportunity to comment on this important proposal. We support the proposed update and look forward to continued partnership in protecting fisheries, access, and the health of Florida's waters.

Sincerely,

A handwritten signature in black ink, appearing to read "Connor Bevan".

Connor Bevan
Inland Fisheries Policy Director
American Sportfishing Association