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FLORIDA SHELLFISH AQUACULTURE ASSOCIATION

December 4, 2018

RE: TCC Proposal for Funding of a Commercial Shellfish Hatchery

Dear Members of the Board for Triumph Gulf Coast, Inc.:

We write to you as the Florida Shellfish Aquaculture Association Board of Directors, on behalf of the Florida shellfish growers and hatcheries throughout the state, to express our concerns about the request for Triumph funds for the Tallahassee Community College. We are opposed to this project on the following grounds.

First, we are opposed to any publicly funded school competing with already established private sector businesses. Florida has numerous private shellfish hatcheries operating in the state. The TCC proposal indicates that the funding would be used to produce oyster spat or seed for commercial aquaculture. There are numerous private businesses currently producing oyster spat for those same purposes. This proposal sets up a direct competition through creation of an entity which has access to public funding not available to private sector. We respectfully suggest that your Board consider other uses of the funds, in keeping with the guidelines for the Triumph awards, such as creating incentives for private sector businesses operating in the region to provide assistance and support.

Secondly, we do not believe this funding request meets the criteria for Triumph awards, as the funding is supposed to be designated for economic purposes and job creation. This proposal does not meet the criteria. Shellfish hatcheries by design do not need many employees. Any hatchery created and owned under a publicly funded educational institution has access to "free" student labor. This labor is frequently used at hatcheries owned by publicly funded institutions such as the ones at Auburn and Louisiana State University. This in itself creates an unfair competition which is not achievable by private sector who must meet salary and benefit requirements as outlined in federal law.

Thirdly, TCC has access to an array of other funding avenues. The current program TCC operates in conjunction with, the Panacea COOP, has fallen under several controversies leaving the public wondering if any project funded for TCC will actually benefit the community. We simply do not believe that these funds have been designated for that purpose.

Finally, there is currently a private hatchery venture which has gained approval through the Wakulla County Board of County Commissioners to move forward with construction. Wakulla County simply cannot support two hatcheries due to water quality and access to suitable waters.

We are concerned that an award to TCC would actually result in unfair competition leading to an actual negative economic impact.

Thank you for considering our position.

Regards,

Heath Davis

Chair