Florida Keys Commercial Fishermen's Association

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October 28, 2012

Dr. Roy Crabtree, Regional Administrator
NOAA Fisheries/SERO
263 - 13th Avenue South
St. Petersburg, FL 33701

Mr. Douglas Boyd, Chairman
Gulf of Mexico Fishery Management Council
2203 N. Lois Avenue, Suite 1100
Tampa, FL 33607

Mr. David Cupka, Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
N. Charleston, SC 29405

Re: Yellowtail Snapper

Dear Dr. Crabtree, Mr. Boyd & Mr. Cupka,

Commercial and recreational harvest of yellowtail snapper is one of the most economically important species in South Florida and especially the Florida Keys with approximately 90% of the entire harvest in the State of Florida taking place in Monroe County/Florida Keys. The positive economic impact reverberates throughout our island communities affecting fishermen, fish houses, restaurants, fish markets, grocery stores, charter fishing operations and tourism.

Collectively, the 5 letter writers below have over 125 years of experience in the commercial and recreational harvest of yellowtail snapper and can attest to the resilience and sustainability of the fishery, fully supported by SEDAR stock assessments conducted in 2003 and 2012. We care about the future of our fishery and pledge our full cooperation toward the successful management of it for generations to come. Therefore, we would like to offer these specific proposals for your consideration:

1. Conduct a thorough review of management options including:
    a. Joint Gulf/South Atlantic Fishery Management Plan
    b. Managing the fishery as one stock with one quota

2. Change the fishing year from January 1 – December 31, of each calendar year to August 1 - July 31, of each calendar year. Therefore, should a fishery closure become warranted, it would occur during the optimal spawning period.

3. Significantly increase the ACL to correspond to the recommended ABC set by the SSC this October and consider setting a SOFT-TAC on the commercial harvest of yellowtail snapper. Yellowtail snapper are not undergoing overfishing or overfished. Over-runs can easily be managed and adjusted in the following fishing season and the action would prevent disruptive, in-season closures.

4. Improve dealer reporting requirements to include electronic reporting at weekly intervals.

Gentlemen, we also extend our sincere appreciation to all of you, for your diligent efforts in re-examining 2012 harvest levels and keeping this valuable fishery open by emergency rule for the balance of 2012.

Sincerely,

s/Bill Kelly

Capt. Bill Kelly
Executive Director

s/Manny Herrera

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Manny Herrera, Commercial Fisherman

s/Marco Herrera

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Marco Herrera, Commercial Fisherman

s/Carter Logan

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Carter Logan, Commercial Fisherman

s/Rick Turner

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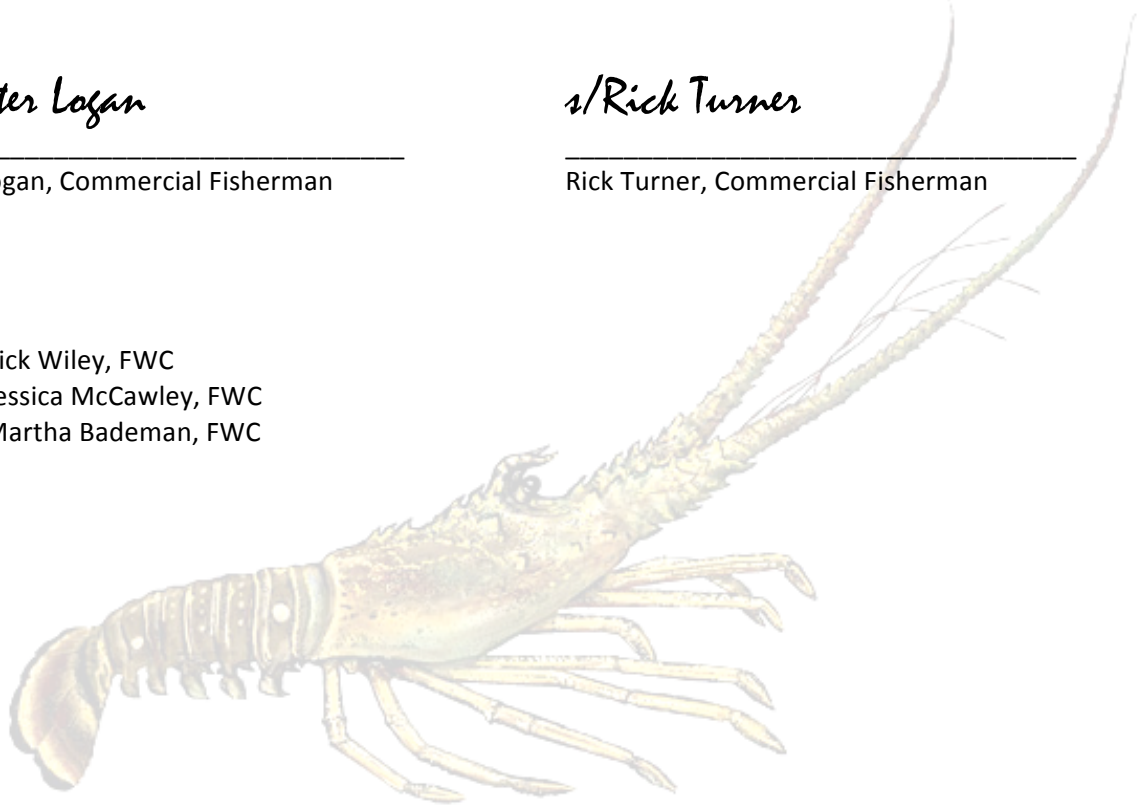
Rick Turner, Commercial Fisherman

C: Mr. Nick Wiley, FWC
Ms. Jessica McCawley, FWC
Ms. Martha Bademan, FWC