

## GENERAL COMMENTS

September 2017 SAFMC Meeting Public Comments Please support the idea of asking NOAA to map our offshore oil and gas deposits once using the safest methods available and make those results public so everyone knows what is there. This is a reasonable alternative to allowing at least five international corporations to each conduct their own confidential seismic testing. Please oppose the idea of allowing open-water fish farming in coastal and offshore waters due to the pollution, parasites, and disease that negatively impact ecosystems around large concentrations of fish confined in crowded cages. Wise use of hatcheries and habitat enhancements could be the perfect blend of open-water aquaculture and wild-caught seafood that lives free and self-sufficient until harvested. These proven management methods can sustainably increase recreational opportunity and seafood production in an environmentally friendly way. Please consider marking and monitoring SMZs with data buoys that transmit live surface and underwater video. This would be a good project for some kind of public/private partnership through the Citizen Science Program. The public should be able to visit these protected areas online like we can with live video feeds of National Parks. These data buoys streaming live video online would prevent poaching while collecting valuable data the world can see. Advertisers could help cover the cost. Please choose Alternative 5 for Amendment 43. I am always happy to answer any questions or go into greater detail. Thank you, Chris McCaffity

### **Florida Keys Commercial Fishermen's Association**

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August 7, 2017

Dr. Michelle Duval, Chair & Council Members

Ms. Leann Bosarge, Chair & Council Members

South Atlantic Fishery Management Council

4055 Faber Place Drive, Suite 201  
Charleston, SC 29405

Gulf of Mexico Fishery Management Council

2203 North Lois Avenue, Suite 1100North  
Tampa, FL 33607

Re: Request for input on the development of a joint amendment to combine the jurisdictional Acceptable Biological Catches and Annual Catch Limits for yellowtail snapper.

Dear Dr. Duval & Ms. Bosarge,

Thank you, for a concerted effort to address and mediate re-occurring closures in the commercial yellowtail snapper fishery in the South Atlantic. Yellowtail snapper are the most economically important finfish harvested in South Florida and the Keys and have been sustainably fished for decades. Recent closures have had enormous and negative economic impacts on our island communities, fishermen, restaurants and consumers. Most unfortunately, ACLs addressing appropriate harvest limits by sectors are seriously out of harmony with science and landings data for recreational and commercial interests.

Dr. Duval, while your letter to Madam Chair Bosarge dated July 24, 2017 addressing the yellowtail snapper conundrum at the upcoming GMFMC meeting is most welcome, it unfortunately brings this topic to the fore when many of our snapper/grouper permit holders are heavily engaged in deploying gear for the August 6<sup>th</sup> start of the annual spiny lobster season in Florida. Logistics of the meeting and timing simply do not afford sufficient opportunity for a thorough analysis of the management alternatives or attendance at the Gulf Council meeting by interested parties including myself.

Over the past several years, I have consistently recommended two potential remedies endorsed by our stakeholders: 1) Hard allocation from the recreational to the commercial sector in the South Atlantic based on repeated underfishing by recreational users in that region. 2) Combining the South Atlantic and Gulf stocks and fishing them under one ACL for both recreational and commercial harvesters. Administratively, the second of the two scenarios appears to have the most merit.

Commercial fishermen in the Gulf of Mexico would be required to have a Gulf Sn/Gr Permit and commercial fishermen in the South Atlantic would be required to have a Sn/Gr permit under the present two-for-one system. Since 75% or more of the stock is harvested in the South Atlantic, we would recommend the South Atlantic take over management responsibility rather than a jointly managed program.

We urge both Councils to act swiftly to develop a framework amendment and conduct scoping meetings at the earliest opportunity with high anticipation this situation can be remedied for the 2017-18 fishing season. As always, our association will provide whatever level of assistance is needed.

Sincerely,

*s/ Bill Kelly*

Capt. Bill Kelly

Executive Director