

South Atlantic Fishery Management Council March Meeting Public Comments

I am Chris McCaffity, a commercial fisherman who has been offering positive solutions that would allow for a responsible harvest of healthy fisheries with very little waste. Please keep an open heart and mind as I share my solutions for reducing Regulatory Discards, promoting safety at sea, producing more seafood and revenue while protecting our Constitutional Rights.

The agenda for Monday includes a Council Visioning Workshop and Joint SAFMC/GMFMC Mackerel Committee meeting. The Visioning Workshop should focus on properly managing quotas with possession limits to avoid multiple extended closures and enhancing our fisheries with Artificial Reef habitat. The Mackerel committee should not rush to exclude fishermen based on low or no landings or due to uncaught quota resulting from a decrease in fishing pressure and a low point in this cyclical fishery. The committee should also consider removing minimum size limits and certainly should not impose any maximum size limits that would be a serious hazard to fishermen and result in high discard mortality rates.

Tuesday's agenda includes committee meetings for Ecosystem-Based Management, Dolphin/Wahoo, Golden Crab, and snapper/grouper. Ecosystem-Based Management needs to primarily focus on properly managing our multi-species fishery with possession limits rather than size limits so everything is legal at the same time as we target fish with higher limits and avoid total closures of others in a nearly full-retention fishery. This would negate the need for spy cameras or observers to make sure we are discarding unnecessarily high percentages of what we catch. The committee's secondary focus should be on creating more Essential Fish Habitat with appropriate and properly placed Artificial Reef structure. Dolphin and Wahoo quota allocations need to consider consumers and neither species should have a size limit or circle hook mandate. The majority of Golden Crab fishermen are well aware of how catch share schemes are destroying other fisheries and do not want them so the council should honor their wishes. The snapper/grouper committee should focus on properly managing quotas so they are filled without long closures rather than continuing to push an unwanted and unnecessary Vessel Monitoring System scheme of questionable Constitutionality in Regulatory Amendment 30.

For Wednesday's agenda I would like to focus on committee meetings for Regulatory Amendments 14 and 18 and Marine Protected Areas. RA 14 and 18 provide a wonderful opportunity for the council to begin properly managing some important commercial quotas to avoid the multiple extended closures that are wasting tons of seafood and compromising the safety of fishermen at sea. For RA 18 I support Alternative 2 for Action 1 and Alternative 3 for Action 2. The seasonal openings for Action 3 should begin on April 1 and October 1 so the possession limits will be high during peak periods and safer weather. I support Alternative 2 for Action 4. I support Alternative 1 for Action 5 and urge the council to revise the Red Porgy Maximum Sustainable Yield baseline that is artificially high based on historical landings errors. For RA 14 I support splitting the Black Sea Bass and Triggerfish quotas into two seasonal quotas beginning on April 1 and October 1 with 1,000 pound possession limits for the first 75% of each quota. The possession limits should be reduced to 100 pounds for the final 25% of each seasonal quota and the bass pot fishery should be shut down for the final 25%. The only way I would

support Marine Protected Areas is IF they are offset with equal areas of new Artificial Reef Habitat and marked with data collection buoys or platforms equipped with video cameras to monitor them without violating our Constitutional Rights the way mandatory Vessel Monitoring Systems on the private property of law abiding American citizens do.

My primary concern for Thursday is the action being taken on Ecosystem-Based Amendment 3. Rather than looking at ways to calculate Regulatory Discards with spy cameras and mandatory observers the council should be working toward creating a full-retention fishery by properly MANAGING each individual quota with appropriate possession limits to avoid multiple extended closures. Properly managing quotas and removing size limits on fish with discard mortality rates over 30% would eliminate almost all Regulatory Discards while allowing fishermen to earn a better living in safer conditions providing consumers with a dependable supply of safe American seafood.

As for Friday's agenda, PLEASE table Regulatory Amendment 30. Please do not continue this attack on our Constitutional Rights by trying to pass a law forcing American citizens to install and maintain spy devices on our private property while paying some corporation a monthly spy fine. This would be a fitting PUNISHMENT for poachers, but not all fishermen should be considered guilty until proven innocent. Marine Protected Areas should be monitored with video cameras on buoys or platforms that provide visual markers for fishermen to avoid.

Thank you for considering my written comments. I will not be able to make it to the St. Simons Island Sea Palms Resort to give my public comments in person. Please listen to my comments at this link. <http://www.blogtalkradio.com/freefish7/2013/02/27/safmc-march-meeting-public-comments>