

# Florida Keys Commercial Fishermen's Association

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December 4, 2011

Ms. Jessica McCawley, Chair & Committee Members  
SAFMC Spiny Lobster Committee  
4055 Faber Place Drive, Suite 201  
N. Charleston, SC 29405

Re: SL Amendment 11

Dear Ms. McCawley & Committee Members,

Our association continues to work diligently with the Gulf and South Atlantic Councils and NMFS-PRD to develop reasonable and acceptable solutions on coral protections sites and trap rope marking. While we have made considerable progress, additional work remains to be done.

Recent meetings with Gulf Council and NMFS-PRD staff have resulted in a total of 56 proposed sites within the EEZ to protect Acropora corals, coral nurseries and five other species of corals as a pro-active measure listed by the ESA as endangered and indigenous to South Florida and the Florida Keys. The net result has been the addition of four more sites than the Bi-Op initially recommended.

Trap rope marking has been a more contentious issue based on the biological benefits of such action and the practicality of the requirement with regard to the type of gear employed in the fishery and methods for implementation stipulated in the Bi-Op. Following a review of the trap rope marking requirements, the burden it would place on industry and the negligible biological benefits of the requirement, both the GMFMC and the FFWCC have taken a "no action" position on the issue at their most recent meetings.

To put both the proposed coral protections sites and trap rope marking in perspective, we have developed a table of additional items for your review and consideration. (See attachment) Mr. Chuck Adams, Marine Economist, University of Florida SeaGrant has also prepared a detailed financial analysis of the impact on the commercial fishery which has been provided to the Councils in previous correspondence.

Thank you for the opportunity to share this information with the Committee and the Council.

Sincerely,

*Bill Kelly*

Capt. Bill Kelly

C:     Mr. Bob Gill, GMFMC  
       Mr. David Cupka, SAFMC

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