

*Florida Keys Commercial Fishermen's Association*

(Formerly Monroe County Commercial Fishermen, Inc.)

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Dr. Richard Leard , Deputy Executive Director  
Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607, USA

**RE: Recommendations of the Spiny Lobster Work Group**

Dr. Leard,

After the Florida Fish and Wildlife Conservation Commission's Spiny Lobster Advisory Panel adjourned, directors from The Florida Keys Commercial Fishermen's Association (FKCFA) became involved with the Spiny Lobster Work Group. For one year, this work group addressed a wide variety of management issues regarding the spiny lobster fishery in Florida waters.

The workgroup took this proactive initiative to help address some of the issues they believed would arise with implementation of the new Magnuson-Stevens requirements; in particular with regard to the designation of staghorn and elkhorn corals as threatened species under the Endangered Species Act.

On April 28, 2009, the FKCFA unanimously voted to send the recommendations of the Lobster Work Group to the National Marine Fisheries Service (NMFS), and its fisheries management councils, as many of the recommendations directly address concerns raised by the Gulf of Mexico Fisheries Management Council and the South Atlantic Fisheries Management Council. While these recommendations do not deal with the management of spiny lobster in its entirety, the main focus of forming the Lobster Work Group was to address issues concerning impacts to marine habitats and bycatch mortality (using sub-legal lobster as attractants).

The recommendations of the workgroup were:

### **Final recommendations for reducing bycatch mortality**

- A) Require one lath on a trap to be made of untreated wood. This would greatly increase the rate at which this lath would deteriorate. Lost trap mortality would be substantially reduced.
- B) Require aerators for live wells. Aerators increase the oxygen in the live well. This in turn would increase the health of sub-legal lobster being transported in live wells.
- C) Continue to support Florida's position on passive trap reduction in that a 10% passive trap reduction remain in place until the total amount of traps in the fishery reaches 400,000 (this reduction will be active- July, 2009).

### **Final recommendations for reducing impacts to marine habitat**

- A) Request that the commercial spiny lobster industry and scientists work together on a project to study different fishing practices and determine which fishing practices result in the least amount of trap movement (NOAA funding has been received by the FWC and CRP research is now entering its 2<sup>nd</sup> phase).
- B) Request that 10% passive trap reduction is activated to reduce environmental impacts of the trap fishery as well as bycatch mortality (this reduction will be active- July, 2009).
- C) Include the Everglades National Park in the emergency trap clean up as well as the Trap Eradication Program.

### **Other Recommendations:**

- A) Support the state of Florida's' Lobster Advisory Boards' recommendation to allocate lobster landings according to historical averages. (72% commercial trap fishery-22% recreational divers-5% commercial dive fishery-1% bully net fishing).
- B) Start commercial trap deployment the day after the mini dive season has ended, but still keep the same opening date to start harvesting (August 6).

Recently, Kenneth Haddad, Executive Director of the FWC, acknowledged the Lobster Work Group's proposals and is currently working with FWC staff in considering a suite of recommendations for the management of Florida's spiny lobster stocks. The FWC has also moved forward with one of the Lobster Work Group's recommendations to collaborate on a cooperative research grant with industry to reduce trap movement which will address impacts to hardbottom areas (especially endangered species such as staghorn and elkhorn coral). It is also worth noting that the Commercial Fishermen's Coral Workgroup has been formed which is focusing on how industry can collectively reduce impacts to hard-bottom habitat.

The FKCFA believes that the recommendations of the Lobster Work Group as well as the collaborative actions between state and industry, are directly addressing NMFS and council concerns, especially related to bycatch and negative impacts to marine habitat. The proactive nature of the state/industry collaboration should reassure NOAA that federally managed resources, like spiny lobster, are receiving their deserved attention.

If you have any questions please do not hesitate to contact us. We look forward to working with the NMFS on reaching consensus on spiny lobster fisheries management issues.

Sincerely,

Scott E. Zimmerman M.Sc.,  
Executive Director

CC: Dr. Roy Crabtree (NMFS), Bob Mahood (SAFMC), Gregg Waugh (SAFMC)