

Florida Keys Commercial Fishermen's Association

(Formerly Monroe County Commercial Fishermen, Inc.)
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June 4, 2009

Robert Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

RE: SAFMC Spiny Lobster Tailing Permit

Mr. Mahood,

The Florida Keys Commercial Fishermen's Association (FKCFA) would like to submit an additional alternative to the jointly managed Gulf of Mexico Fishery Management Council (GMFMC)/ South Atlantic Fishery Management Council (SAFMC) "tailing permit" motion in Amendment 6 (GMFMC Administrative Lead) for commercial spiny lobster fishing in the South Atlantic and Gulf of Mexico.

The FKCFA purposes that the councils add a 4th option as follows:

"(4) All spiny lobster landed by commercial and recreational vessels with a tailing permit is landed either all "whole", **or** all "tailed."

This motion by the FKCFA board achieved a majority vote on April 28, 2009. The board agreed that this option would allow commercial fishermen with a tailing permit to process their product on multi-day trips. Forcing fishermen with tailing permits to tail their entire harvest will close the loophole on those who use the tailing permit to circumvent the 3 inch carapace length minimum size measurement. We believe this proposal preserves the original intent of the tailing permit.

Thank you for considering this option and if you have any questions please do not hesitate to contact us.

Sincerely,

Scott E. Zimmerman M.Sc.,
Executive Director

CC: Rick Leard (Executive Director, Gulf of Mexico Fishery Management Council)
Gregg Waugh (Deputy Executive Director, South Atlantic Fishery Management Council)

