January 18, 2014

Chairman Ben Hartig
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Chairman Hartig,

Thank you for the opportunity to provide input on a number of proposed fishery management plan amendments that are up for either scoping or public hearings this month

Below are our comments for council consideration.

Snapper Grouper Regulatory Amendment 16 (Scoping):

Black sea bass pot fishery closure November 1 through April 30 -

We believe the actions the fishery council took in Snapper-Grouper Amendment 18A in 2012, such as capping the number of vessels utilizing pot gear at 32, limiting vessel to 35 pots, requiring that pots be brought back to shore after each trip and establishing a commercial trip limit of 1,000 lb., reduced the potential for any interactions with right whales, even though there never have been any documented interactions between whales and pot gear.

The CFSF supports allowing a black sea bass pot fishery November 1 through April 30, even if it is restricted to areas outside the defined right whale critical habitat, such as considered in new Alternative 6 of the proposed Amendment.

Snapper Grouper Amendment 29 (Public Hearing):

Only Reliable Catch Stocks (ORCS) Approach -

We support amending the fishery council's ABC Control Rule proposed in Action 1, Alternative 2, to adopt the SSC's recommended approach to determine ABC values for Only Reliable Catch Stocks.

Action 2: We support the application of the revised ABC Control Rule to the selected unassessed snapper-grouper species in the low, moderate and high risk categories using the Risk Tolerance scalars in Sub-alternatives 2b, 3b and 4b.

Fishermen would benefit for the higher ACLs that would result from the amended ABC control rule and the application of the higher Risk Tolerance scalars.

Gray Triggerfish –

Action 3: We support Alternative 4, which would specify a minimum size limit for gray triggerfish of 14 inches fork length in federal waters off North Carolina, South Carolina, Georgia, and east Florida.

From the standpoint of yield from a 12 inch or smaller triggerfish, it is not large enough to benefit commercial markets and is small even for personal consumption. We think the fishery would benefit from a minimum size limit of 14 inches.

Action 4: We support Alternative 2, which would change the allocation of the commercial ACL to 50 percent from January 1 through June 30 and the other 50 percent from July 1 through December 31 each year. The gray triggerfish seasons would then mirror the seasons for vermilion snapper and since these are co-occurring species that are caught together, this Alternative would reduce bycatch of both species.

Action 5: We support the use of trip limits to manage commercial fisheries, however this action needs more alternatives for analysis.

Consideration should be given to establishing a trip limit for gray triggerfish that is combined with a step-down trip limit when 75 percent of the commercial ACL is met or is projected to be met. A range of step-down trip limits such as 50 lb., 75 lb., 100 lb., and 150 lb. should be considered.

Coastal Migratory Pelagics Amendment 24 (Scoping):

Modifying sector allocations for Atlantic migratory group Spanish mackerel and Gulf migratory group king mackerel -

The CFSF supports optimization of fishery ACLs. It's clear that in both fisheries, the total ACLs have never been landed in the 10 year time series within Tables S-1 and S-2 in the scoping document, and that the commercial sector has exceeded its ACL while the recreational sector has landed decreasingly lower proportions of its ACL.

The fishery council should consider reallocation alternatives in both fisheries.

Coastal Migratory Pelagics (Mackerel) Framework Amendment 1 (Public Hearing):

Modify the Annual Catch Limit (ACL) for Atlantic and Gulf Spanish mackerel migratory groups -

The CFSF supports the alternatives that would increase the ACLs for these fishery groups.

Consideration of our comments is appreciated.

Respectfully,

Wayne Mershon
President

Dear Sir;

As a part time looking to go full time commercial fisherman, these two amendments will have a large impact on me and my business. I am happy to provide input for these amendments.

Amendment 24
In regards to the Reallocation of Recreational King mackerel ACL, I think a gradual shifting of the ACL from Rec to Comm is warranted. My reasons are two-fold.
1) The recreational fishery hasn't come close to reaching their ACL.
The closest was the 2001-2002 fishing year, when they reached 52.9% of their quota. This alone should warrant movement of unfilled ACL to another sector. Even when the Comm sector has gone over their ACL, the total landed ACL has never even reached 70% of the total stock TAC/ACL.

2) The Western Gulf, Florida, Northern subzone has THE SMALLEST allocation of ANY other sector. As such, our region closes extremely early. An increase of even 250K Lbs. wouldn't put a dent in the King populations and still leave the recreational sector with plenty. A shift of 10% at first to see the impact, I believe, would be welcome and warranted. I will get into the impact of this statement below discussing separate permits for Atlantic/Gulf.

Amendment 26
I have had a Federal King Mackerel limited Entry Permit for just 1.5 years. Before that, I had just a regular RS endorsement, which in Fl., allows me to sell my bag limit of Kings. When I started, Kings were pretty much open year round as our quota was so small, the guys from the East Coast which travel into the western gulf to fish didn't bother stopping. The ones that did only stayed for a short period and then left. Now, our sector closes typically in Oct after opening in July.
I have a had a couple of telephone conversations with Susan Gerhart at NMFS regarding options to extend our season here and not blocking out "The little guy" from getting kings. Kings are just starting to show up in good quantities in late Sept. and early Oct. when the sector here closes. Below, find my recommendations for Amendment 26.

1) I think that a separate license should be established for Gulf and Atlantic OR you MUST declare which zone you are fishing in. (Kings Only) The amount of boats that travel are not that many, but yet they come into other's sectors and fill the quota. This isn't fair for most if not all of the other permit holders which don't travel. While I AM NOT against ANYONE making a living, the few boats that do travel create
allot of angst for the vast majority that do not.

2) I don't think that you should be able to get more than one permit.
It should be Gulf OR Atlantic. Should that fisherman move to the other sector, (IE: Gulf or Atlantic) maybe a one-time trade-in clause or some other way to get the correct permit could be afforded. Otherwise, said fisherman would have to sell the permit in order to obtain a new one.

3) For the issue of the "Mixing Zone", The Endorsement Program might work, as long as it's JUST FOR that zone.

4) The only issue I have, which has been discussed for other issues, is the income requirement. I have a couple of friends that had boat issues last year and they couldn't fish. It's not fair that for that one bad year, they could get penalized. Completely do away with that requirement. Things will sort their own way out on that issue without having to cause an undue burden on a fisherman and his / her family.

Thank you for your time and consideration. Should you have any questions or wish to contact me, please feel free to do so at the below phone number or you may reply to this e-mail or Devndeb@hotmail.com

Mr. Devan S. DeBarr
Ft. Walton Beach, Fl.
850-499-0420

Amendment 24 comments.

Hello,

Looking at the NMFS claimed Sector landings for King and Spanish mackerel, I see a direct correlation with the Commercial sector being allowed to have greater access and even overfish, with the
decreasing amount able to be caught by the recreational side. I experience this first hand when running Charters of East Central Florida. When we as Recreational Anglers find good numbers of
King Mackerel along our coast, and congregated along ridge lines, shoals or bait pods, its not long
before the Commercial Fleet finds them and works the area heavily. It's a very noticeable change
in bite from before and after the commercial operations begin.

If anything, holding the Commercial Sector accountable to stay within their limits, applying sector
AM's as needed, would allow the recreational Sector to better access our quota. Additionally, the
old time practice of Kings caught Recreationally on Dual Permitted boats, and being sold commercially
after the charter is alive and well, and needs stopped.

The Recreational Sector though providing an economic impact on local communities 100 to 1 per pound
of fish caught has been hammered hard through overzealous regulation. To take away more at this
time would be a major slap in the face to all recreational anglers. 98% of fish caught in the US are
caught Commercially, yet the 2% caught Recreationally exceed the economic impact of commercial catch's.
It seems the current quota is pretty balanced, and conservationally minded (expect the commercial overages).
No reduction in Recreational Harvest should be taken, and if anything, Recreational Anglers deserve more
access to this and other fisheries.

Captain Henry
ACME Ventures Fishing
Florida
321-794-7955

F/V HULL'S SEA LOVER

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

CMPAmend24Comments@safmc.net

Date: Saturday February 01, 2014

Re: Coastal Migratory Pelagics Fishery Management Plan Amendment 24

Mr. Mahood,

I would submit this written comment to the South Atlantic Fishery Management Council (SAFMC) about the Coastal Migratory Pelagics (CMP) Fishery Management Plan Amendment 24 to examine sector allocations and determine if annual catch limit (ACL) changes may need to be made for Atlantic Spanish mackerel migratory group and Gulf King mackerel migratory group.

The SAFMC states in the scoping document for CMP Amendment 24 that "in multiple fishing seasons over the past ten years, the commercial sector has exceeded the commercial ACL while the recreational sector has landed decreasingly lower proportions of the recreational ACL. (**Tables S-1** and **S-2**)."

I support the effort to examine and revise the current commercial and recreational allocations for both the Atlantic Spanish mackerel migratory group and the Gulf King mackerel migratory group and every stock. Every year the recreational sector is leaving a great deal of unutilized fish stocks in the ocean that could be better utilized by commercial fishermen for consumer uses.

The total ACL of each stock should be harvested every year. These valuable seafood resources belong to the American citizens and should be harvested for optimum yield by the sector that can accomplish harvesting the total ACL.

I would support and recommend examination and reallocation of unused ACL to the sector in need of more allocation by the sector that is not using their allocation every three years.

Captain Jimmy Hull

Hull's Seafood, Inc.
F/V Hull's Sea Lover
Black Sea bass (BSB) Pot Endorsement Holder
Snapper Grouper Advisory Panel Member
Bottlenose Dolphin Take Reduction Team Member
SouthEast Data, Assessment and Review (SEDAR 25) BSB Data Workshop Panelist and Assessment Workshop Observer

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

CMPAmend24Comments@safmc.net

Date: Tuesday January 28, 2014

Re: Coastal Migratory Pelagics Fishery Management Plan Amendment 24

Mr. Mahood,

The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) about the Coastal Migratory Pelagics (CMP) Fishery Management Plan (FMP) Amendment 24 to examine sector allocations and determine if changes may need to be made for Atlantic Spanish mackerel migratory group and Gulf King mackerel migratory group.

The SAFMC states in the scoping document for CMP Amendment 24 that "in multiple fishing seasons over the past ten years in both the Atlantic migratory group Spanish mackerel fishery and the Gulf migratory group king mackerel fishery, the commercial sector has exceeded the commercial ACL while the recreational sector has landed decreasingly lower proportions of the recreational ACL (**Tables S-1** and **S-2**)."

Table S-1. Proportion of sector ACLs landed and proportion of total ACL landed for Atlantic migratory group Spanish mackerel (South Atlantic and Mid-Atlantic regions)

Fishing Year	Stock TAC/ACL	% of Sector ACL Landed		TOTAL ACL Landed
		Comm[1]	Rec[2]	
2000-01	7.04 MP	68.9%	72.8%	70.7%
2001-02	7.04 MP	79.2%	64.6%	72.6%
2002-03	7.04 MP	83.5%	51.8%	69.2%
2003-04	7.04 MP	96.8%	58.5%	79.5%
2004-05	7.04 MP	86.7%	42.9%	67.0%
2005-06	7.04 MP	94.7%	52.0%	75.5%
2006-07	7.04 MP	94.1%	52.2%	75.2%
2007-08	7.04 MP	79.5%	54.0%	68.0%
2008-09	7.04 MP	74.1%	64.6%	81.9%
2009-10	7.04 MP	89.5%	66.5%	108.3%
2010-11	7.04 MP	89.8%	55.7%	117.7%
2011-12	5.69 MP	92.1%	48.1%	128.1%

[1]Commercial allocation = 55% [2]Recreational allocation = 45%
Fishing year = March to February Source: SERO

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Table S-2. Proportion of sector ACLs landed and proportion of total ACL landed for Gulf migratory group king mackerel.

Fishing Year	Total TAC/ACL	% of Sector ACL Landed		Total ACL Landed
		Comm[1]	Rec[2]	
2000-01	10.2 MP	94.3%	45.0%	60.8%
2001-02	10.2 MP	89.8%	52.9%	64.7%
2002-03	10.2 MP	99.0%	40.6%	59.3%
2003-04	10.2 MP	97.5%	46.3%	62.7%
2004-05	10.2 MP	98.9%	36.5%	56.4%
2005-06	10.2 MP	92.3%	43.2%	58.9%
2006-07	10.8 MP	93.5%	45.0%	60.5%
2007-08	10.8 MP	99.8%	35.8%	56.3%
2008-09	10.8 MP	111.9%	32.0%	57.6%
2009-10	10.8 MP	110.4%	48.0%	68.0%
2010-11	10.8 MP	102.4%	29.7%	53.0%
2011-12	10.8 MP	99.3%	33.2%	54.3%

[1]Commercial allocation = 32% [2]Recreational allocation = 68%
Fishing year = July to June. Source: SERO

The SFA ECFS supports the effort to examine and revise the current commercial and recreational allocations for both the Atlantic Spanish mackerel migratory group and the Gulf King mackerel migratory group (includes the current mixing zone on the Florida east and southern coasts. Looking at the SAFMC Tables provided in the CMP Amendment 24 it is obvious that the recreational sector is leaving a great deal of unutilized fish stocks in the ocean that could be better utilized by commercial fishermen for consumer uses.

For Atlantic Spanish mackerel migratory stock the SFA ECFS suggests that a slight commercial percentage increase of 5% to 10% would be useful, and still allow the recreational sector plenty of fish to land.

For Gulf King mackerel migratory stock the SFA ECFS suggests that a significant commercial percentage increase of 18% would be useful, and still allow the recreational sector plenty of fish to land.

Jimmy Hull, Chairman
SFA ECFS
jgh/rhh

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