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

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)

EAST COAST FISHERIES SECTION (ECFS)

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

CMP26Comments@safmc.net

Date: Tuesday January 28, 2014

Re: Coastal Migratory Pelagics Fishery Management Plan Amendment 26

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 26 on separating the commercial permits for Spanish mackerel and king mackerel into SAFMC and Gulf of Mexico Fishery Management Council (GMFMC) permits.

The SFA ECFS supports the effort to separate the commercial permits for both Spanish mackerel and King mackerel into SAFMC and GMFMC permits, with one caveat that any fishermen with history fishing for each species in both Council areas will be issued limited access permits for both regions into the future. We hope both Councils will keep this effort simple at this time by simply dividing the regions, and establishing a limited access permit for Spanish mackerel, similar to what currently exists for the King mackerel commercial fishery.

One other concern about current regions as compared to future regions should use the true ranges scientifically verified for the Atlantic and Gulf migratory groups for both species. Currently the SouthEast Data, Assessment and Review (SEDAR 38) joint King mackerel Data Workshop has scientifically verified that the current mixing zones on the Florida east and southern coasts are not correct and should be changed.

The scientific SEDAR 38 change will make all the area north of the Miami-Dade County/Monroe County, Florida into 100% Atlantic migratory group with no substantive Gulf migratory group mixing. The area south of the Miami-Dade County/Monroe County, Florida, and to the west of the south side of the Florida Keys to the Dry Tortugas will become the revised mixing zone with a 50% split between the Atlantic and Gulf migratory groups of King mackerel. All areas north and west of the Florida Keys/Dry Tortugas will be 100% Gulf migratory stock.

The SFA ECFS supports this substantive scientific change to better represent the true state of the nature of the King mackerels.

Jimmy Hull, Chairman
SFA ECFS
jgh/rhh

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