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South Atlantic
Fishery Mgmt. Council

Amendment 26 Scoping Document Table 1 is incorrect

The Scientific and Statistical Committee is completely wrong!

Summer 2014 the number of small Kingfish in the Gulf of Mexico was astronomically high. This winter 2014/2015 the number of small Kingfish off Florida's East coast is also way above normal. I've never seen so many small Kingfish in my life. SEDAR 38 (SEDAR 2014) was done without knowledge of these massive numbers of small fish! The 2012 spawn must have been terrific!

Next year these fish will be eight to ten pounders. In 2017 when they're 15 to 20 pounders the OFL should be 24 million pounds or more.

I believe the recruitment of Kingfish during a year of no hurricanes is seven times larger than that of a normal hurricane season. In 2013 there were zero hurricanes. Again in 2014 the hurricane season was super slow. Because of these slow hurricane seasons in the next two years we will see a lot more of these little fish.

In 2017 the 2013 spawned fish will be 12 to 15 pounders. In 2017 the 2014 spawned fish will be 10 to 12 pounders. Their numbers will great...astronomically great!!! Add todays little fish to those numbers!

I suspect the giant seas produced by hurricanes kill large numbers of Kingfish fry that are younger than four months old.

Perhaps your Scientist should consider how weather affects fish recruitment. Your Statistics should be based on the great numbers of small fish! You are being feed bullshit...don't swallow it.

Because of the reasons stated above (you need smarter Scientist) I feel that the2017 OFL should be 24 million. The 2017 ABC high set at 24 million, the low at 23. The 2020 the OFL should exceed 29 million.

Please send a copy of this letter to all scientist and marine biologist employed by the NMFS because they're slow and need help!

All members of the Gulf and South Atlantic council should also receive a copy of this letter.

Table 1 of Scoping Document Amendment 26 is so wrong that the people that created it should be fired!

Daniel C. Kane AKA Huri-Kane Dan 2-6-2015

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Reallocation of Gulf King Mackerel

I believe that the Florida Panhandle deserves the majority of said Reallocation.

Today the Panhandle (Northern Zone) has more participants than the Western Zone! The Northern Zone probably has more participants than the Southern Zone.

I was at a meeting a year or two ago when a couple of fishermen from Tampa said that they would like to participate in the King Mackerel fishery. They complained that the fishery was always closed when the fish were in their area.

The Northern Zone needs 700,000 pounds of King Mackerel. This Zone deserves an equal share of the Gulf quota.

I would like to see a split season/quota for this zone. A quota of 700,000 pounds should be split into two 350,000 seasons.

Open the first season on April 1st at 500 pounds a day limit. This will allow the Tampa Fishermen to participate in the fishery. The East Coast fishery opens on this date and market value (flooded market) is reason I suggest a 500 pound limit. At 500 pounds a day the 350,000 pounds should last five or six months.

On October 1st start the second season at 1250 pounds a day limit. Reduce the daily limit to 500 pounds a day on Thanksgiving, the reason for this reduction is that the Florida East Coast starts landing large numbers of King-fish at this time. The Florida Bay (Southern Zone) also starts catching King Mackerel around this time. I want to keep the Market from flooding if possible...this will help keep our fish prices up.

Any un-used quota should be added to next season.

At these catch limits a one million pound quota for this Zone should keep this zone open all year long...perfect !

This will give the local stone crabbers something to catch during their closed season!

Daniel C. Kane AKA Huri-Kane Dan 2-6-2015

Re: Amendment 26

2/5/2015

1.)

On the east coast of Florida, X amount of King Mackerel have been produced on record for decades. Call them or label them what you will. Gulf Group King Mackerel, Okay that's what the winter fish had been named way back when. What a mistake oh don't get me wrong. There has been so called Gulf fish here at times but not in Nov. when the fleets in the Atlantic start to tally trip ticket weight onto the East Coast sub zone stock. Maybe the Gulf fish, that were mechanically tagged here way back in the 70,s were from here the Atlantic to begin with, had anybody back then though of that when the Gulf postage stamp was put on them. Fish that went to the Gulf or came back from the Gulf or visa versa or what ever, still does anybody really know? There are so many variables and more all the time in the changing oceans. Just label every fish that was caught on this coast out of the Atlantic waters up to date, Atlantic King Mackerel. So now with that simple point in mind and in moving ahead with the boundary's being redefined. There is nothing else fair or logical to do but to keep that 1.22 million pound, the so-called Gulf stock number here on the Atlantic side.

What an on fair mistake for this sentence to be printed. This is incorrect. A quote from the paragraph bellow … THESE FINDINGS ELIMINATE ONE OF THE COMMERCIAL ALLOCATIONS ZONES FOR GULF MIGRATORY GROUP, AND WILL REQUIRE REALLOCATION OF THE ANNUAL CATCH LIMIT AMONGST THE REMAINING GULF COMMERCIAL ZONES. >>> No I' am sorry, I strongly oppose this. I agree the Gulf may need more commercial quota but come up with it some other way. The East Coast Gulf sub zone number should remain on the east coast where it originated, then expanded. And now be relabeled Atlantic. Very simple.

In 2014, a stock assessment of both migratory groups of king mackerel was completed (SEDAR 38), and indicated that neither migratory group was overfished or experiencing overfishing. In addition to revised yield streams, the stock assessment redefined the spatial and temporal extent of the mixing zone between the migratory groups to be south of the Florida Keys during winter months. The stock assessment also redefined the geographic boundary between the migratory groups to be at the Dade/Monroe County line. >>>>These findings eliminate one of the commercial allocation zones for the Gulf migratory group, and will require reallocation of the annual catch limit (ACL) amongst the remaining Gulf commercial zones. <<<<< Wrong.

A bit of a repeat here, but this is public comment and I will continue. Please forgive me, the numbers may not be totally correct.

Atlantic stock 3.8 million pounds, April 1 to Oct. 31, Gulf stock Nov. 1 to March 31, 1.22 million pounds. These numbers have been produced with fish out of Atlantic waters. Please take these numbers and add them together and label that the Atlantic stock a no brainer no reallocation needed. Also start the season March 1.

2)

I strongly oppose North Carolina with their hidden agenda's trying to get or take 33% of the Atlantic fish. I strongly oppose any boundaries or regions. The real and true King Mackerel fisherman ---that families solely depend on King Fishing--- with there FEDERAL PERMIT should be able to migrate and fish in pursuit of migratory pelagic fish, any where in this free country. And remember that when these guys' leaders in the industry from here the east coast of Florida did travel and went and showed people how to produce a quality well taken care of product (King Mackerel) on a steady basis, it helped the fishery and markets. And that's the way it is and should remain.

3)

I am somewhat opposed to let the sale of any by catch from a shark net or any net.

---Over fishing from the large un- efficient wasteful run around gill nets and the indiscriminant drift nets is what started all this Quota mess to begin with, when production from those methods did cause overfishing. By the way the 500 thousand pounds of poor quality King Fish that is being produced with airplane-assisted run-around gillnets down in the keys needs to be stopped. And those fish caught by a few privileged people be reallocated to the hook and liners in the Gulf. Those un-transferable run around gill net permits should be eliminated a.s.a.p. And a push or any effort to turn those permits into catch shares I strongly oppose. ---

The first thing that comes to mind with the "drift gill net small coastal shark fishery" is that they will forget the sharks and produce the daily commercial trip limit of King Mackerel. However if its one or two fish per: one or two man crew and it can be strongly enforced legally and by the industry, it is acceptable.

4)

I approve the sale of King fish from a charter boat out with a charter, only if that boat is a combination commercially permitted King Mackerel boat and charter boat. The sale of King Fish from a charter should be limited to the recreational per person daily bag limit only and those fish weights should be tallied on to the recreational quota not the commercial. Any other charter drift or head boats should not be able to sell King Mackerel.

Captain Al Quatraro
FV ZORA

11 February 2015

Mr. Bob Mahood
South Atlantic Fisheries Management Council (SAFMC)
4055 Faber Place, Suite 201
North Charleston, SC 29405

Re: Joint Coastal Migratory Pelagics (CMP) Fishery Management Plan (FMP) Amendment 26

Mr. Mahood,

The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment on the Joint CMP FMP Amendment 26 five actions for King Mackerel (KM) being scoped by the SAFMC and Gulf of Mexico Fishery Management Council (GMFMC). Although SFA ECFS provides comment, below, on many aspects of the Amendment 26 scoping document, we believe that stakeholders are not prepared to choose between the action alternatives for Action #5 until the Atlantic KM ACL is determined.

Action 1. Factors to consider when updating the Atlantic king mackerel annual catch limit (ACL)

As a result of the 2014 SEDAR 38 stock assessment, the Atlantic KM stock is not overfished, nor is overfishing occurring. The options in the Table 1 below for a High, Medium, and Low OFL, and ABC for Atlantic KM are a result of concerns over variable "recruitment" rates in the South Atlantic Council region.

However, **SFA ECFS** analysis, submitted to the SAFMC and the Council's SSC, indicates significant new KM recruitment into the fishery during 2014. As a result, the **SFA ECFS** prefers the **"Medium"** recruitment rate as a realistic option for the SAFMC to choose for setting the KM ACL. The SAFMC decision on setting ACLs for the Atlantic KM fishery will be based on Table 1 analysis, pasted below, from the CMP Amendment 26 scoping document.

Table 1. South Atlantic SSC recommendations for acceptable biological catch for Atlantic migratory group king mackerel, using data resultant from SEDAR 38 (2014).

P star= 0.325		ABC HIGH	ABC MED	ABC LOW	Deterministic equilibrium yield at $F_{SPR}30$	Deterministic equilibrium yield at 75% $F_{SPR}30$	Buffer between ABC and OFL		
Fishing year	OFL						HI	MED	LO
2015	22.0581	20.1065	19.6765	19.1127	12.702	11.582	9%	11%	13%
2016	19.75	17.4478	16.5454	15.3707	12.702	11.582	12%	16%	22%
2017	18.2914	15.8215	14.3298	12.9389	12.702	11.582	14%	22%	29%
2018	16.6987	14.1257	12.9331	11.9398	12.702	11.582	15%	23%	28%
2019	15.1871	12.6589	12.0557	11.5715	12.702	11.582	17%	21%	24%
2020	14.2985	11.54	11.2501	11.0247	12.702	11.582	19%	21%	23%

111 W. GRANADA BLVD
ORMOND BEACH, FLORIDA 32174-6303
SFAECFS@AOL.COM

The SAFMC should set the Atlantic king mackerel ACLs at the same medium level as the ABCs recommended by the SAFMC SSC in the table above.

The current Atlantic king mackerel ACLs were designated in Amendment 18 (GMFMC/SAFMC 2011):
Total Atlantic king mackerel ACL: 10,460,000 lbs ww
Commercial ACL: 3,880,000 lbs ww
Recreational ACL: 6,580,000 lbs ww
Recreational annual catch target (ACT): 6,110,000 lbs ww

The recent approval of CMP FMP Amendment 20B by the Secretary of Commerce, the commercial quotas for the Northern and Southern Zones in the South Atlantic would be:
Northern Zone (33.3%): 1,292,040 lbs ww
Southern Zone (66.7%): 2,587,960 lbs ww
The boundary between the Northern and Southern Zones is the boundary between the EEZs of North Carolina and South Carolina.

NOTE: The Atlantic king mackerel ACLs are designated under the stock boundary currently in use for management.

Action 2. Modifying the stock boundary based on the SEDAR 38 stock assessment

SFA ECFS prefers modifying the current Atlantic & Gulf stock boundaries based on the SEDAR 38 scientific recommendations.
SFA ECFS prefers the Dade/Monroe County north for 100% Atlantic king mackerel stock, year round.
SFA ECFS prefers the 50% Atlantic king mackerel stock in new mixing zone south of Dade/Monroe County, and west to the south side of the Dry Tortugas, year round.

Action 3. Sector and commercial zone allocations for Gulf king mackerel

The current Gulf king mackerel ACLs were designated in Amendment 18 (GMFMC/SAFMC 2011):
Total Gulf king mackerel ACL: 10,800,000 lbs ww
Commercial ACL: 3,456,000 lbs ww
Recreational ACL: 7,344,000 lbs ww
The **SFA ECFS** prefers to wait until the Gulf stakeholders state their choices during the scoping meetings planned to occur soon.

Action 4. Allowing sale of Atlantic king mackerel bycatch from the drift gillnet small coastal shark fishery

The **SFA ECFS** supports the sale of Atlantic KM bycatch from the drift gillnet small coastal shark fishery.
The **SFA ECFS** will support a for-hire boat recreational bag limit sale only if the CMP Amendment 26 creates safeguards against any double counting with commercial allocations by having used a recreational for-hire sector bag limit landing sale. The use of the hazard analysis and critical control points (HACCP)

111 W. GRANADA BLVD
ORMOND BEACH, FLORIDA 32174-6303
SFAECFS@AOL.COM

process, through certified dealers with these bag limit landings, needs to be properly documented back to the permitted vessel. The HACCP protocol keeps the seafood safe and the landings accountable.

SFA ECFS wants to reduce regulatory discards by utilizing secondary catch (i.e. bycatch) for sale that historically existed prior to CMP Amendment 20A becoming effective July 16, 2014.

Action 5. Management to address effort in the Florida east coast subzone

The **SFA ECFS** does not support any effort reduction in the CMP fisheries, specifically for king mackerel, at this time. The **SFA ECFS** recommends that the SAFMC address the Florida east coast subzone permit management in a future CMP Amendment, following the Council's implementation of the SEDAR 38 King mackerel results using the "best scientific information available" (BSIA).

Note: The limited access Joint Council king mackerel permit is the same permit used for all commercial fishing entities from Texas to Massachusetts (that includes Hawaii, Massachusetts, Michigan, New Jersey, New York, Texas, Virginia, Ontario, Canada and others) with 1,336 king mackerel permits as the estimated total currently listed as active permits.[1]

The future CMP Amendment 28 to the Joint Gulf & South Atlantic CMP FMP should separate king mackerel fishery permits and the fishery management plan itself between the two Council regions. The Action 5 scoping choice should be removed from the draft CMP Amendment 26 until implementation of the SEDAR 38 BSIA recommendations. Further changes to the Councils' Joint KM Fishery Management Plan can then proceed in a more informed manner.

The East Florida sub-zone commercial king mackerel fishery stakeholders know that the idea of supporting permit endorsements, at this time, is premature. Some stakeholders believe it is a step towards a type of catch share program that many fishermen do not want to participate in. Catch shares have been opposed for many years in the SAFMC region by a majority of stakeholders, particularly those who have limited access king mackerel permits and are home ported in the SAFMC region.

Jimmy Hull, Chairman
SFA ECFS
111 West Granada Blvd
Ormond Beach, FL 32174-6303

[1] http://sero.nmfs.noaa.gov/operations_management_information_services/constituency_services_branch/freedom_of_information_act/common_foia/KM.htm Current NMFS FOIA Permit List

111 W. GRANADA BLVD
ORMOND BEACH, FLORIDA 32174-6303
SFAECFS@AOL.COM