DIRECTED SUSTAINABLE FISHERIES, INC. (DSF)

A SALT WATER FISHERIES CONSULTING COMPANY

Wednesday 10 February 2016

Mr. Gregg Waugh, Executive Director
South Atlantic Fishery Management Council (SAFMC)
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: South Atlantic Public Hearing Document Summary Amendment 26 for Coastal Migratory Pelagics Amendment 26 01/15/2016[1] mailto:mike.collins@safmc.net

Mr. Waugh,

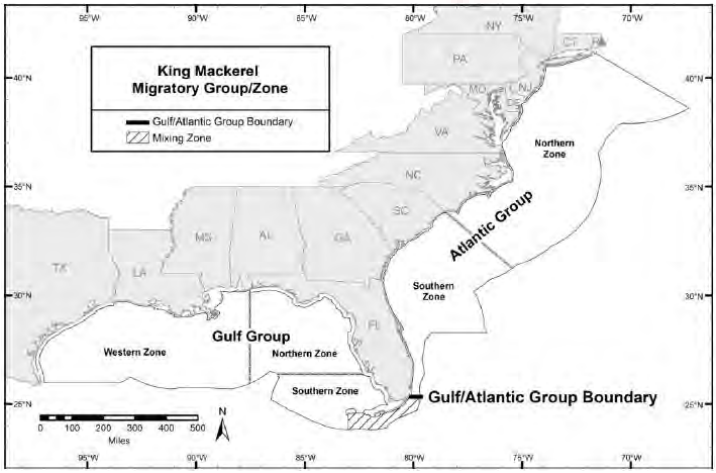
Directed Sustainable Fisheries Inc., (DSF) submits this written comment on behalf of the SAFMC King Mackerel Industry stakeholders. The **DSF Preferred Alternatives, Options and Recommendations** are highlighted in bold **Red**. Any **previous comments**, oral or written are replaced by the changes reflected in this final DSF written comment being submitted to the SAFMC as of this date, 10 February 2016.

DSF PREFERRED MANAGEMENT ALTERNATIVES

Action 1 – Adjust the Management Boundary for Gulf and Atlantic Migratory Groups of King Mackerel

DSF Preferred Alternative 3: Establish a single year-round boundary for separating the Gulf and Atlantic migratory groups of king mackerel at the Miami-Dade/Monroe county line (**Figure 3** (Amendment Figure 2.1.3)). The Gulf Council would be responsible for management measures in the mixing zone.

(Gulf and South Atlantic AP Recommended)



[1] Figure 3 (Amendment Figure 2.1.3) found on PDF page 6/28 (page 6) in the 15 January 2016 South Atlantic Public Hearing Document Summary Amendment 26 for Coastal Migratory Pelagics Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/2016/01_2016/CMP26_PHSummary_011516.pdf

Action 2 – Update Reference Points (MSY, MSST, MFMT/OFL), and Revise the Annual Catch Limit (ACL) and Recreational Annual Catch Target (ACT) for Atlantic Migratory Group King Mackerel

Action 2-1 – Revise the Acceptable Biological Catch (ABC) for Atlantic Migratory Group King Mackerel

DSF Preferred Alternative 2: Revise the ABC for Atlantic Migratory Group King Mackerel for 2016/17 through 2019/20 based on the ABC levels recommended by the SSC for ABC under a high recruitment scenario.
(Gulf AP and South Atlantic AP Recommended)

Table 3[2]. ABC recommendations from the October 2014 SSC meeting for Atlantic Migratory Group King Mackerel.

P star= 0.325	ABC HIGH Recruitment Scenario	ABC MED Recruitment Scenario	ABC LOW Recruitment Scenario	Buffer between ABC and OFL		
Fishing year	**Alt 2**	**Alt 3**	**Alt 4**	HI	MED	LO
2016/17	17.4 mp	16.5 mp	15.4 mp	12%	16%	22%
2017/18	15.8 mp	14.3 mp	12.9 mp	14%	22%	29%
2018/19	14.1 mp	12.9 mp	11.9 mp	15%	23%	28%
2019/20	12.7 mp	12.1 mp	11.6 mp	17%	21%	24%

Action 2-2 – Revise ACLs, Commercial Quotas, and Recreational ACT for Atlantic Migratory Group King Mackerel

DSF Preferred Alternative 2: Revise the ACL and recreational ACT based on the ABC levels selected under Action 2-1. **ACL = OY = ABC**, recreational ACT = [0.5 or (1-PSE), whichever is greater].
(South Atlantic AP Recommended)

Table 2.2.2.1.[3] Possible outcomes under **Alternative 2** based on alternatives in Action 2-1. The recreational allocation is 62.9% and the commercial allocation is 37.1%. The Northern Zone allocation is 23.04% and the Southern Zone allocation is 76.96% (see Appendix E for details on how the Northern and Southern Zone quota allocations were recalculated using the SEDAR 38 boundary).

[2] Table 3 found on PDF page 9/28 (page 9) in the 15 January 2016 South Atlantic Public Hearing Document Summary Amendment 26 for Coastal Migratory Pelagics Amendment 26
http://safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/2016/01_2016/CMP26_PHSummary_011516.pdf
[3] Table 2.2.2.1 found on PDF page 28/210 (page 15) in the 20 January 2016 Version of CMP Amendment 26
http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf

Table 2.2.2.1

ACL = ABC HIGH Recruitment Scenario **Action 2-1, Alt 2**						
Fishing year	Total Atl KM ACL	Commercial			Recreational	
		Comm ACL	Northern Zone Quota (lbs)	Southern Zone Quota (lbs)	Rec ACL	Rec ACT
2016/17	17.4 mp	6.5 mp	1,497,600	5,002,400	10.9 mp	10.1 mp
2017/18	15.8 mp	5.9 mp	1,359,360	4,540,640	9.9 mp	9.2 mp
2018/19	14.1 mp	5.2 mp	1,198,080	4,001,920	8.9 mp	8.3 mp
2019/20	12.7 mp	4.7 mp	1,082,880	3,617,120	8.0 mp	7.4 mp

*ACT value calculated based on formula from CMP Amendment 18, using the average PSE from 2005-2009.

DSF does not recommend the SAFMC ~~Preferred Alternative 3~~ for three reasons:

- **The recommended ABC is equal to the final year of the ACL = ABC projections 2019/2020 found in Table 2.2.2.1 above. See the annual overfishing limit (OFL) in Table 3 above Table 2.2.2.1 for the buffer difference by X% between the ABC and the OFL for high recruitment.**
- **The SAFMC SSC imposed an excessive P* (Pstar) penalty in spite of the king mackerel stock not being overfished, and overfishing is not occurring based on SEDAR 38 results.**
- **The SSC recommends a "rumble strip" examination of king mackerel recruitment after a couple of years into the projections in case an ACL adjustment up or down is warranted.**

South Atlantic ~~Preferred Alternative 3:~~ Establish ACL = OY = Deterministic equilibrium yield at F30%SPR = 12.7 mp for fishing years 2016/17 through 2019/20.
(Recommended by the South Atlantic SSC and Gulf AP)

Alternative 3	
Atlantic King Mackerel ACL	12.7 mp
Commercial ACL	4.7 mp
Northern Zone Quota	1,082,880 lbs
Southern Zone Quota	3,617,120 lbs
Recreational ACL	8.0 mp
Recreational ACT*	7.4 mp

*ACT value calculated based on formula from CMP Amendment 18, using the average PSE from 2005-2009.

Action 3 – Incidental Catch Allowance of Atlantic Migratory Group King Mackerel Caught in the Shark Gillnet Fishery

DSF Preferred Alternative 3: Allow retention and sale of Atlantic migratory group king mackerel caught with gillnet as incidental catch in the gillnet portion of the commercial shark fishery for any vessel with a valid shark directed commercial permit AND valid federal king mackerel commercial permit. The king mackerel must be sold to a dealer with the Southeast federal dealer permit. For shark gillnet trips in the Southern Zone, no more than 2 king mackerel per crew member can be on board, and no more than 2 king mackerel per crew member can be sold from the trip. For shark

gillnet trips in the Northern Zone, no more than 3 king mackerel per crew member can be on board, and no more than 3 king mackerel per crew member can be sold from the trip.
(Gulf AP and South Atlantic AP Recommended)

Table 2.3.1[4]. Information on gillnet trips landing shark and king mackerel in Florida from 2010-2014.

Year	# Gillnet Trips Shark[a]	# Gillnet Trips Shark and King Mackerel	# Participants with Shark/KM Gillnet Trips	Total Lbs King Mackerel Landed on Shark Gillnet Trips	Average Lbs King Mackerel Landed on Shark Gillnet Trips
2010	168	28	5	1255.3	44.8
2011	382	21	3	1039.0	49.5
2012	498	32	4	923.5	28.9
2013[b]	298	33	5	2635.4	79.9
2014[c]	161	23	4	2474.2	107.6
TOTAL	**1507**	**137**	--	**8327.3**	**60.8**

a Small coastal sharks (SCS)—blacknose, sharpnose, bonnethead, and finetooth
b SCS closed in September 30, 2013
c SCS closed in July 28, 2014
Source: ACCSP

Action 4 – Establish Commercial Split Seasons for Atlantic Migratory Group King Mackerel in the Southern Zone

DSF Preferred Alternative 2: Allocate the Southern Zone quota for Atlantic king mackerel into two quotas: 60% to the period March 1 - September 30 (season 1) and 40% to the period October 1 – February 28/29 (season 2). Any remaining quota from season 1 would transfer to season 2. Any remaining quota from season 2 would not be carried forward. When the Southern Zone quota for the season is met or expected to be met, commercial harvest of king mackerel in the Southern Zone will be prohibited for the remainder of the season.
(South Atlantic AP Recommended)

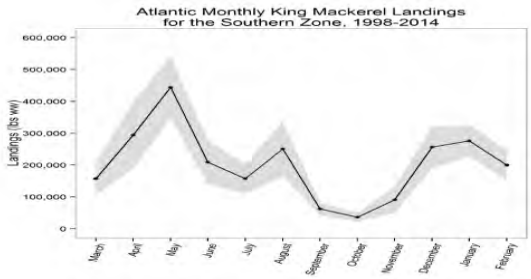


Figure 2.4.1[5]. King mackerel commercial landings in the Southern Zone by month for fishing years 1998-99 through 2013-14. The solid line shows the average pounds per month, and the gray shaded area includes pounds per month with CI= 95%.
Source: NMFS ALS

[4] Table 2.3.1 found on PDF page 33/210 (page 20) in the 20 January 2016 Version of CMP Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf
[5] Figure 2.4.1 found on PDF page 36/210 (page 23) in the 20 January 2016 Version of CMP Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf

Table 2.4.1[6]. Examples of possible split season quotas for the Southern Zone (in lbs) with a 60/40 allocation (Alternatives 2 and 3).

	ACL=ABC[1] High Recruitment[2]		ACL=ABC[1] Medium Recruitment[3]		ACL=Deterministic Equilibrium Yield at $F_{30\%SPR}$[4]	
	Season 1 (60%)	Season 2 (40%)	Season 1 (60%)	Season 2 (40%)	Season 1 (60%)	Season 2 (40%)
2016/17	3,001,440	2,000,960	2,816,736	1,877,824	2,170,272	1,446,848
2017/18	2,724,384	1,816,256	2,447,328	1,631,552		
2018/19	2,401,152	1,600,768	2,216,448	1,477,632		
2019/20	2,170,272	1,446,848	2,077,920	1,385,280		

1 Alternative 2 under Action 2-2
2 Alternative 2 under Action 2-1, ABC under High Recruitment Scenario
3 Alternative 3 under Action 2-1, ABC under Medium Recruitment Scenario
4 Alternative 3 under Acton 2-2

Action 5 – Establish a Trip Limit System for the Southern Zone

DSF Preferred Alternative 2: In the Southern Zone, the trip limit north of the Flagler/Volusia county line is 3,500 lbs. For the area south of the Flagler/Volusia county line, establish a year-round trip limit of 75 fish for Atlantic king mackerel.
(South Atlantic AP Recommended)

DSF Preferred Alternative 4: In the Southern Zone, the trip limit north of the Flagler/Volusia county line is 3,500 lbs. For the area south of the Flagler/Volusia county line, establish a trip limit of 50 fish for season 2 (as designated in Action 4).
(South Atlantic AP Recommended)

DSF Preferred Option 4a: Beginning on February 1 and continuing through the end of February--
(1) If 70 % or more of the season 2 quota has been taken, the trip limit is 50 fish.
(2) If less than 70 % of the season 2 quota has been taken, the trip limit is 75 fish.
(South Atlantic AP Recommended)

Action 6 – Modify the ACL for Gulf Migratory Group King Mackerel

DSF Preferred Alternative 2: Set the Gulf migratory group king mackerel **ACL equal to the ABC** recommended by the Gulf Scientific and Statistical Committee (SSC) for 2015-2019.
(Gulf and South Atlantic AP Recommended)

ABC values are in millions of pounds, whole weight:

Year	OFL	ABC
	P = 0.50*	*P* = 0.43*
2015	10.11	9.62
2016	9.61	9.21
2017	9.27	8.88
2018	9.11	8.71
2019	8.95	8.55

[6] Table 2.4.1 found on PDF page 37/210 (page 24) in the 20 January 2016 Version of CMP Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf

Action 7 – Revise the Commercial Zone Quotas for Gulf Migratory Group King Mackerel

DSF Preferred Alternative 4: Revise the commercial zone quotas for Gulf migratory group king mackerel as follows: 40% for the Western Zone; 18% for the Northern Zone; 21% for the Southern Zone Handline component; and 21% for the Southern Zone Gillnet component. **(Gulf AP Recommended)**

Table 2.7.2[7]. Options for redistribution of commercial zone allocation for Gulf migratory group king mackerel by percentage.

Zone	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Western	31%	38.98%	45.53%	40%
Northern	5.17%	13.15%	7.61%	18%
Southern: H/L	15.96%	23.93%	23.43%	21%
Southern: Gillnet	15.96%	23.93%	23.43%	21%
FL East Coast	31.91%			

Table 2.7.3. Options for redistribution of commercial zone allocation for Gulf migratory group king mackerel in pounds of fish. Assumes the ACL = ABC as in Alternative 2 of Action 6, and sector allocations represented by Alternative 1 in Action 8.

Zone	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Western	1,071,360	1,199,883	1,401,596	1,231,360
Northern	178,675	404,733	234,266	554,112
Southern: H/L	551,578	736,892	721,269	646,464
Southern: Gillnet	551,578	736,892	721,269	646,464
FL East Coast	1,102,810			

Action 8 – Revise the Recreational and Commercial Allocations for the Gulf Migratory Group King Mackerel

DSF Preferred Alternative 4: Conditionally transfer a certain percentage (*Options a-d*) of the stock ACL to the commercial sector until such a time that recreational landings reach a predetermined threshold (*Options e-g*). If this threshold is met, the recreational and commercial allocations will revert to 68% for the recreational sector and 32% for the commercial sector.

Conditional Quota Transfer (MUST CHOOSE ONE):

DSF Preferred Option 4a: Transfer 5% of the stock ACL to the commercial sector.
(South Atlantic AP Recommended)

Recreational ACL Threshold (MUST CHOOSE ONE):

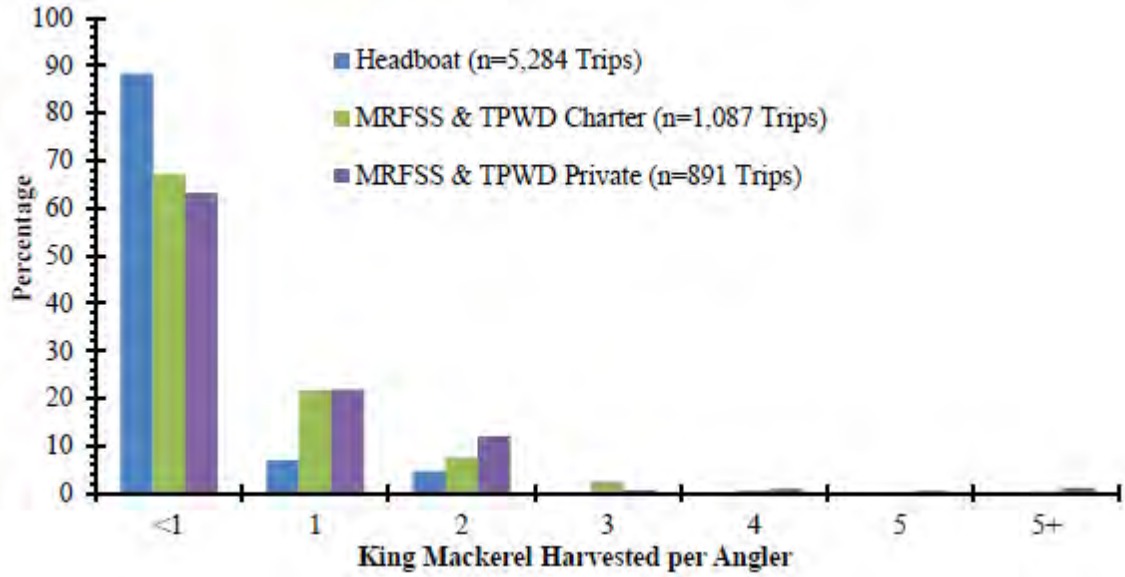
DSF Preferred Option 4e: Revert to the status quo sector allocations if 80% of the adjusted recreational sector ACL is landed.
(South Atlantic AP Recommended)

Action 9 – Modify the Recreational Bag Limit for Gulf Migratory Group King Mackerel

DSF Preferred Alternative 2: Increase the bag limit to three fish per person per day.
(Gulf and South Atlantic AP Recommended)

[7] Table 2.7.2 & 2.7.3 found on PDF page 45/210 (page 32) in the 20 January 2016 Version of CMP Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf

Figure 2.9.1[8]. Distribution of Gulf of Mexico migratory group king mackerel harvested per angler by mode from 2011 through 2013.



Source: NMFS SERO LAPP/DM Branch.

Rusty

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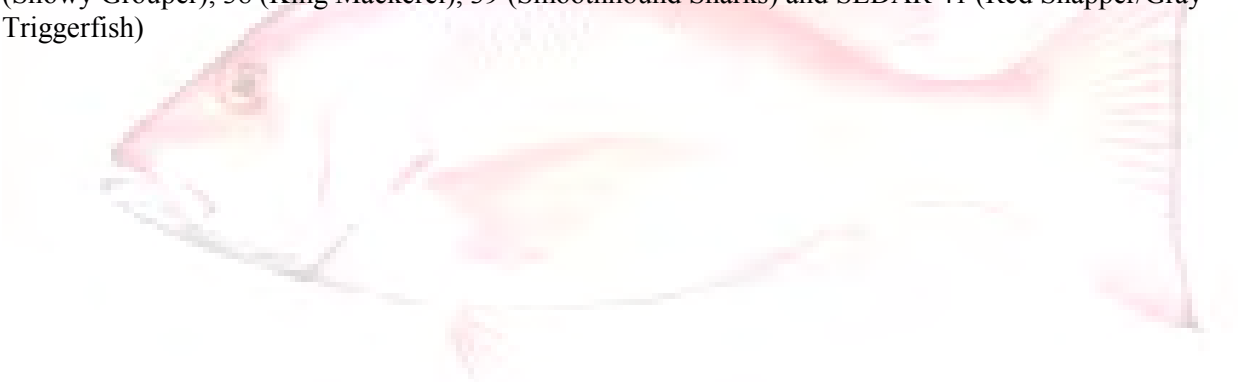
American Elasmobranch Society (AES) member 2004-2016
Atlantic Coastal Cooperative Statistics Program (ACCSP) Advisory Committee Florida member
ACCSP Biological Review Panel (BRP) member

[8] Figure 2.9.1 found on PDF page 52/210 (page 39) in the 20 January 2016 Version of CMP Amendment 26 http://safmc.net/sites/default/files/meetings/pdf/Advisory%20Panels/2016/02_Mackerel/Att1_CMPAm26_SAtlVersion_012015.pdf

ACCSP Bycatch Prioritization Committee (BPC) member
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) Florida (FL) Advisory Panel (AP) commercial & for-hire recreational member [former Chair of CS AP]
National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) AP Commercial Shark member 2016-2018
NMFS HMS SouthEast Data, Assessment and Review (SEDAR) AP Pool member 2016-2021
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member no term limits
SAFMC Fisheries Citizen Science Workshop Participant 2016
SAFMC Snapper-Grouper (SG) AP FL commercial member 2015-2017
SAFMC Marine Protected Area (MPA) Expert Work Group (EWG) participant 2012-2013
Former SAFMC MPA AP FL commercial member
Former NMFS Atlantic Large Whale Take Reduction Team FL participant (ALWTRT)
Former NMFS Bottlenose Dolphin Take Reduction Team FL participant (BDTRT)
Participant, observer and/or contributor to US coastal shark stock assessments during 1992, 1996, 1998, 2001, 2002, 2005, 2006, 2007 and 2010-2015
Participant, observer and/or contributor SEDAR 11 (Large Coastal Sharks), 13 (Small Coastal Sharks), 16 (King Mackerel), 19 (Red Grouper/Black Grouper), 21 (Large Coastal Sharks/Small Coastal Shark), 24 (Red Snapper), 25 (Black Sea Bass/Golden Tilefish), 28 (Spanish Mackerel/Cobia), 29 (Gulf Blacktip Shark), 32 (~~Gray Triggerfish~~/Blueline Tilefish), 34 (Atlantic Sharpnose Shark/Bonnethead Shark), 36 (Snowy Grouper), 38 (King Mackerel), 39 (Smoothhound Sharks) and SEDAR 41 (Red Snapper/Gray Triggerfish)