

Summary of Comments

4 individuals provided public comment at the hearings.  
3 individuals provided written comments.

**Action 1- H&L trip limits for Gulf king mackerel**

- One commenter supported Alternative 4 (1,250 lbs with no reduction).
- Two commenters supported no action.
- Two commenters supported a 3,000 lb trip limit. The commenter also noted that this could affect the number of inactive permits by making trips more efficient.
- One commenter supported Alternative 3c (3,000 lbs with no reduction in the Eastern Zone Southern Subzone) and 4b (1,250 lbs with no reduction in the Eastern Zone Northern Subzone)

**Action 2- fishing seasons for Gulf king mackerel**

- Two commenters supported no action. One commenter stated that changes in the fishing years will hurt the Atlantic fishermen's market.
- One commenter supported Alternative 2 (change the season to Sept 1- Aug 1).

**Action 3- provision to transit through closed king mackerel zones**

- All 5 commenters supported a transit provision.

**Action 4.1 and 4.2- regional allocation of Atlantic group king mackerel and Spanish mackerel**

- One commenter supported Alternative 2, Option D, to give North Carolina the quota they have been requesting.
- Two commenters supported no action.

**Action 5- framework procedure modification**

- Two commenters supported Preferred Alternative 2.
- One commenter also supported Preferred Alternatives 4 and 5.

**Action 6- cobia ACL/ACT**

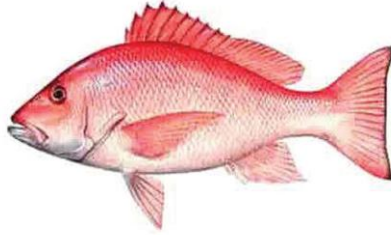
- Three commenters supported the Preferred Alternative 3 and Preferred Option D.

Hi my name is Vincent Bonura from Goin' Off Enterprises Inc. My comment directed towards Amendment 20: I support higher trip limits for King Mackerel. **Action 1** I support **Alternative 3: Set the commercial hook and line trip limit at 3000 pounds with no reduction.** I support this in all zones. With todays high expenses and fuel cost fisherman can not afford to not have reasonably high trip limits. Please keep American fisherman fishing. **Action 3** I support **Alternative 4: Allow transit through areas closed to king mackerel fishing for vessels possessing king mackerel that were legally harvested in the EEZ.**

Tight Lines,  
Vincent Bonura

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

Date: Sunday August 18, 2013

Re: Coastal Migratory Pelagics Amendment 20 Proposed Six Actions and DSF Preferred Alternatives  
MackAm20Comments@safmc.net

Mr. Mahood,

The Directed Sustainable Fisheries, Inc. (DSF) is submitting written comment concerning the South Atlantic Fishery Management Council's (SAFMC) proposed actions on Coastal Migratory Pelagics (CMP) fishery management plan (FMP) Amendment 20. DSF preferred alternatives are presented, and comments from DSF are in "red" with each of the six actions.

## **Action 1 - Modify the Commercial Hook-and-Line Trip Limits for Gulf Migratory Group King Mackerel**

**Alternative 1:** No Action – Retain the existing commercial hook-and-line trip limits. (**Gulf Mackerel AP Preferred**)

a. **Gulf Preferred** Western Zone at 3,000 lbs.

**DSF supports Preferred Alternative 1a for CMP FMP Amendment 20 Action 1.**

**Alternative 3:** Set the commercial hook-and-line trip limit at 3,000 lbs. with no reduction. (**SA Mackerel AP Preferred**)

**DSF supports Preferred Alternative 3 for CMP FMP Amendment 20 Action 1.**

**South Atlantic Preferred** Option a: For the Western zone

**DSF supports SAFMC Preferred Alternative 3, Option a for CMP FMP Amendment 20 Action 1.**

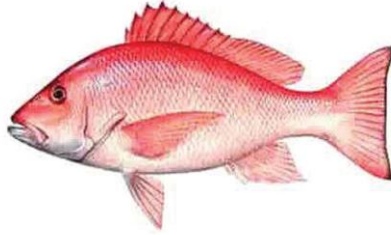
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**South Atlantic Preferred/Gulf Preferred Option c:** For the Eastern Zone Southern Subzone

**DSF supports Preferred Option c for CMP FMP Amendment 20 Action 1.**

**Alternative 4:** Set the commercial hook-and-line trip limit at 1,250 lbs. with no reduction.

**South Atlantic Preferred/Gulf Preferred Option b:** For the Eastern Zone Northern Subzone

**DSF supports Preferred Alternative 4, Option b for CMP FMP Amendment 20 Action 1.**

*The Gulf Council removed Option a under Alternatives 2-4 but the South Atlantic Council has not reviewed and approved these changes.*

## **Action 2 - Change the Fishing Season for Gulf Migratory Group King Mackerel for the Eastern and Western Zone**

**Alternative 1:** No Action - the fishing season remains July 1 – June 30. (Gulf Mackerel AP Preferred for Western Zone and Eastern Zone Southern Subzone)

**South Atlantic Preferred Alternative 2:** Change the fishing season for Gulf migratory group king mackerel to September 1 – August 31.

**DSF supports SAFMC Preferred Alternative 2 for CMP FMP Amendment 20 Action 2.**

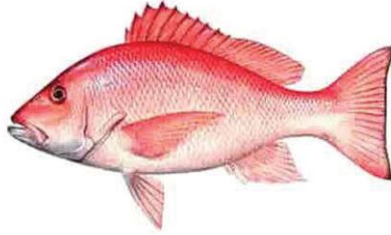
**Gulf Preferred Option a:** For the Western Zone

**Alternative 3:** Change the fishing season for Gulf migratory group king mackerel to October 1 – September 30.

**Gulf Preferred Option b:** For the Eastern Zone (Gulf AP Preferred for Eastern Zone Northern Subzone only)

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## **Action 3 – Establish a Transit Provision for Travel through Areas that are Closed to King Mackerel Fishing**

**South Atlantic Preferred/Gulf Preferred Alternative 4:** Establish a provision allowing transit through areas closed to king mackerel fishing for vessels possessing king mackerel that were legally harvested in the EEZ off areas open to king mackerel fishing. **(SA Mackerel AP Preferred) (Gulf Mackerel AP Preferred, but only for vessels with VMS)**

**DSF supports Preferred Alternative 4 for CMP FMP Amendment 20 Action 3.**

## **Action 4 Establish Regional Annual Catch Limits (ACLs) for Atlantic Migratory Group King Mackerel and Spanish Mackerel**

### **Action 4.1 – Establish Regional Annual Catch Limits (ACLs) for Atlantic Migratory Group King Mackerel**

**Alternative 1:** No Action - retain one commercial ACL for the Atlantic migratory group king mackerel.

**DSF supports Alternative 1 (No Action) for CMP FMP Amendment 20 Action 4.1 as a Preferred Alternative.**

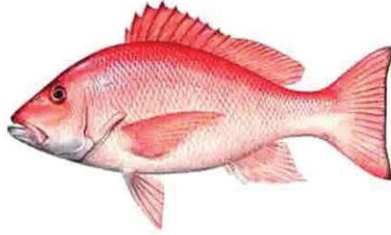
### **Action 4.2 – Establish Regional Annual Catch Limits (ACLs) for Atlantic Migratory Group Spanish Mackerel.**

**Alternative 1:** No Action - retain one commercial ACL for the Atlantic migratory group Spanish mackerel

**DSF supports Alternative 1 (No Action) for CMP FMP Amendment 20 Action 4.2 as a Preferred Alternative.**

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## **Action 5 - Modify the Framework Procedure.**

**South Atlantic Preferred/Gulf Preferred Alternative 2:** Modify the framework procedure to include changes to acceptable biological catches (ABCs), ABC/ACL control rules and, accountability measures (AMs) under the standard documentation process for open framework actions.

Accountability measures that could be changed would include: **(SA Mackerel AP Preferred) (Gulf Mackerel AP Preferred)**

### Inseason AMs

- Closures and closure procedures
- Trip limit reductions or increases
- Designation of an IFQ program as the AM for species in the IFQ program
- Implementation of gear restrictions

### Postseason AMs

- Adjustment of season length
- Implementation of a closed season
- Adjustment or implementation of bag, trip, or possession limit
- Reduction of the ACL to account for the previous year overage
- Revoking a scheduled increase in the ACL if the ACL was exceeded in the previous year
- Implementation of gear restrictions
- Reporting and monitoring requirements

**DSF supports Preferred Alternative 2 for CMP FMP Amendment 20 Action 5.**

**South Atlantic Preferred/Gulf Preferred Alternative 4:** Modify the framework procedure to include designation of responsibility to each Council for setting regulations for the migratory groups of each species. **(SA Mackerel AP Preferred) (Gulf Mackerel AP Preferred)**

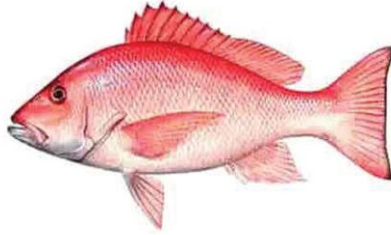
**DSF supports Preferred Alternative 4 for CMP FMP Amendment 20 Action 5.**

**This pertains to:** Responsibilities of Each Council:

1. Recommendations with respect to the Atlantic migratory groups of king mackerel, Spanish mackerel, and cobia will be the responsibility of the South Atlantic Council, and those for the Gulf migratory groups of king mackerel, Spanish mackerel, and cobia will be the responsibility of the Gulf Council, with the following exceptions:

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- a. The South Atlantic Council will have responsibility to set vessel trip limits, closed seasons or areas, or gear restrictions for 1) the Eastern Zone - East Coast Subzone for Gulf migratory group king mackerel and 2) the east coast of Florida including the Atlantic side of the Florida Keys for Gulf migratory group cobia.
  2. For stocks where a stock assessment indicates a different boundary between the Gulf and Atlantic migratory groups than the management boundary, a portion of the ACL for one migratory group may be apportioned to the appropriate zone, but management measures for that zone will be the responsibility of the Council within whose management area that zone is located.
  3. Both councils must concur on recommendations that affect both migratory groups.

**South Atlantic Preferred/Gulf Preferred Alternative 5.** Make editorial changes to the framework procedure to reflect changes to the names of the Council advisory committees and panels. (**SA Mackerel AP Preferred**) (**Gulf Mackerel AP Preferred**)

**DSF supports Preferred Alternative 5 for CMP FMP Amendment 20 Action 5.**

## **Action 6. Modify the Gulf and Atlantic Migratory Group Cobia Annual Catch Limits (ACLs) and Annual Catch Targets (ACTs).**

**South Atlantic Preferred/Gulf Preferred Alternative 3:** The ACL for each jurisdictional area would be determined as follows:

**DSF supports the SAFMC Preferred/Gulf Preferred Alternative 3 for CMP FMP Amendment 20 Action 6.**

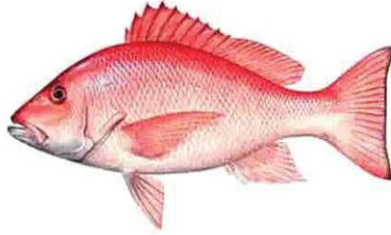
The Gulf migratory group cobia ABC (as determined by the SSCs) would be divided into a Gulf Zone ACL and a Florida East Coast Zone ACL (Florida/Georgia border to the Gulf and South Atlantic Council jurisdictional boundary) based on the options below.

**South Atlantic Preferred/Gulf Preferred Option d:** Use 1998-2012 (15 years) landings to establish the percentage split for the Gulf ABC. (**SA Mackerel AP Preferred**)

The Atlantic migratory group ACL would be equal to the ABC for the Atlantic migratory group cobia (as determined by the SSCs).

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Management measures set by the South Atlantic Council for the Atlantic migratory group would also apply to the Gulf migratory group Florida East Coast Zone.

The ACLs and ACTs would be as follows:

<b>Gulf Migratory Group</b>		<b>Atlantic Migratory Group</b>
(see Table 2.6.3 for values for each option)		
<b>Gulf Zone</b>	<b>FL East Coast Zone</b>	
ACL = x% ABC	ACL = x% ABC Commercial ACL = 8% ACL Recreational ACL = 92% ACL	ACL = ABC = OY Commercial ACL = 8% ACL Recreational ACL = 92% ACL
Stock ACT = 90%ACL	Recreational ACT = ACL [(1-PSE) or 0.5, whichever is greater]	Recreational ACT = ACL [(1-PSE) or 0.5, whichever is greater]

## ***Rusty***

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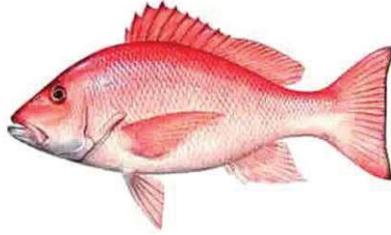
Saltwater Fisheries Consultant, Shark Specialist  
Deep-Sea Fisherman and Shrimp Boat Captain  
Recreational, For-Hire & Commercial Fishing Life Experience, 1959-2013  
Retired 100-ton United States Coast Guard (USCG) Licensed Sea Captain  
Fifth Generation Waterman from Central Florida East Coast  
Seafood Coalition (SFC) member  
American Elasmobranch Society (AES) member 2004-2013  
Atlantic Coastal Cooperative Statistics Program (ACCSP) Advisory Committee member from Florida  
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) Florida (FL) Advisory Panel (AP) commercial & for-hire recreational member [former Chair of CS AP]

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National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) AP commercial member 2013-2015  
NMFS HMS SouthEast Data, Assessment and Review (SEDAR) AP Pool member 2013-2015  
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member  
SAFMC Marine Protected Area (MPA) Expert Working Group participant  
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, 2011, 2012 and 2013  
Participant, observer and/or contributor SouthEast Data, Assessment and Review (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), and SEDAR 36 (Snowy Grouper)

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## Coastal Migratory Pelagics Amendments 19 and 20 and Framework Comments

I am Chris McCaffity, a snapper/grouper fisherman who occasionally sells a bag limit of King Mackerel. I am deeply disappointed to learn that some permit holders are asking the council to take other people's permits because they are not using them enough. It should be viewed as a good thing that not many permit holders are actively competing for a piece of the fishery that is currently in a down cycle. The very idea of this scheme to take away permits is causing people to target King Mackerel when they might not otherwise. Stopping other commercial fishermen from selling a bag limit is also going to increase effort as we must buy a permit to sell our catch and try to catch more King Mackerel to pay for it. I understand not allowing tournaments to sell King Mackerel or any other fish. Those tournaments are for charity. Tournament fish should be donated to soup kitchens and food pantries rather than competing with commercial fishermen.

I OPPOSE banning the bag limit sale of Spanish and King Mackerel by commercial fishermen working in other fisheries.

I SUPPORT banning the sale of tournament fish. Let the charities that feed people benefit from that seafood rather than selling it to give the money to some other charity.

I OPPOSE the elimination of inactive permits. This kind of action was wrong in other fisheries and it is wrong for this one. Eliminating competition through the strong arm of our federal government is never right.

I SUPPORT allowing fishermen to decide with a 2/3 majority vote of participating permit holders what the trip limits, transit provisions, and transfers at sea should be.

Thank you for considering my comments. Please send any questions or comments to [freefish7@hotmail.com](mailto:freefish7@hotmail.com)