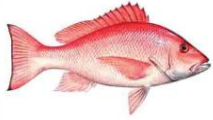


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)

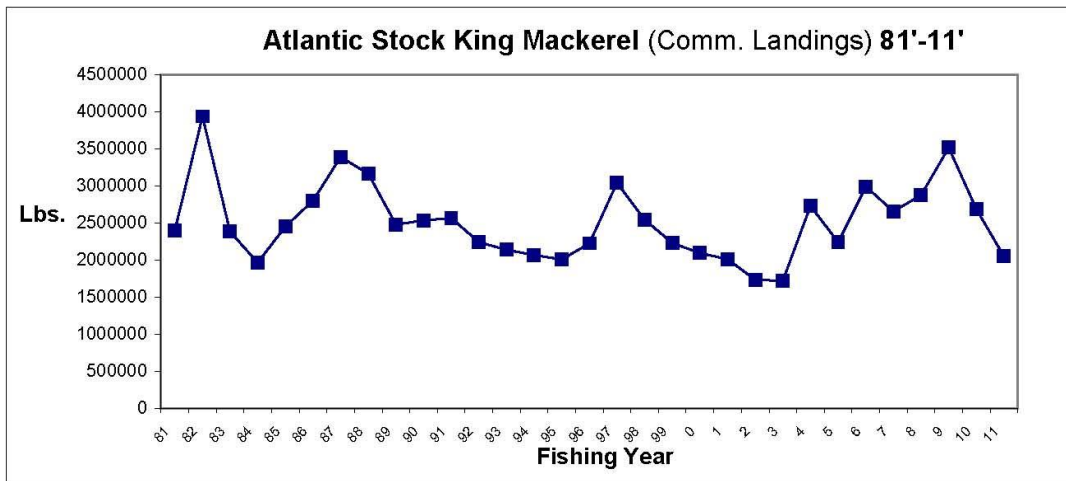


EAST COAST FISHERIES SECTION (ECFS)

Sunday September 09, 2012

The **Southeastern Fisheries Association, East Coast Fisheries Section (SFA-ECFS)** is **opposed to any Emergency Framework Actions on the Atlantic stock of King Mackerel**, as considered by the SAFMC's Mackerel Committee on September 12, 2012. Alternatively, we believe that any management decisions on the Atlantic stock should result from the 2013 King Mackerel stock assessment. We base this opinion on three lines of evidence from landings data in recent history.

1. Historical commercial landings data of Atlantic stock King Mackerel from 1981-2011 have remained relatively steady, and include several periods of significant landings over the past 30 years that are surrounded by "average" landing years. We do not believe that decreased landings since 2010 constitute a decline beyond the normal landings oscillations over the past 30 years.



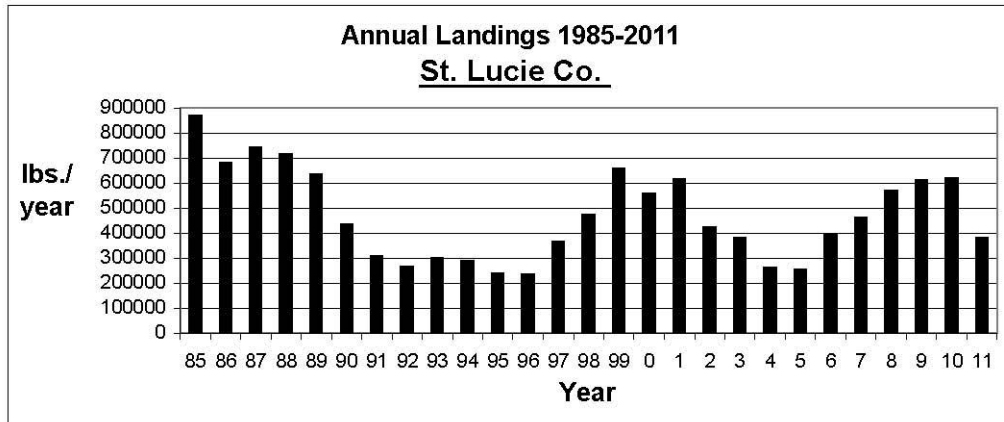
Data source: NMFS

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



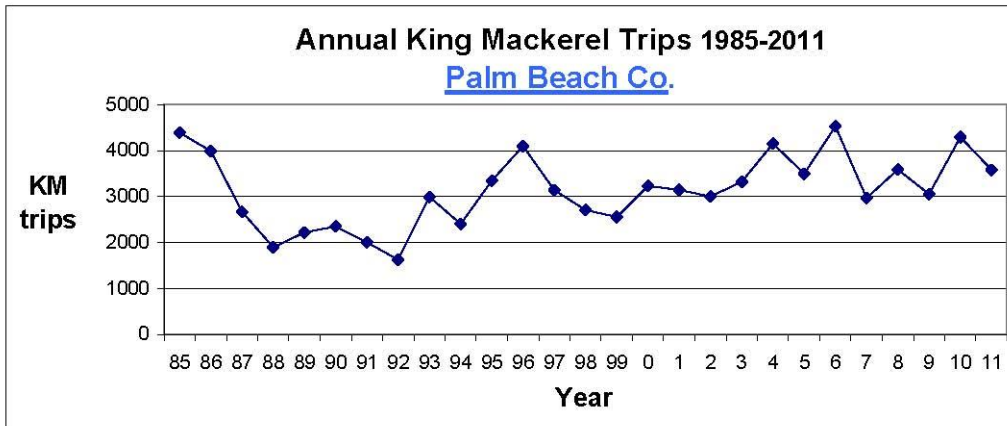
EAST COAST FISHERIES SECTION (ECFS)

2. Specifically, more localized data from the dominant geographic region of commercial landings in east Florida strongly indicate that historical fluctuations in landings are an indicator of normal fluctuations in Atlantic stock abundance of King Mackerel.



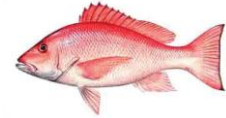
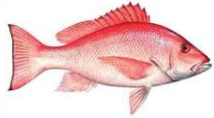
Data source: FL- FWC

3. Over the past 3 decades, neither effort (in terms of commercial King Mackerel “trips”) or nominal Catch Per Unit Effort (CPUE), has changed drastically over time, particularly over the past several years. In fact, for nominal CPUE, the landings (wt.) per trip, has increased over the past decade despite short term changes in landings and effort in the highest catch region.

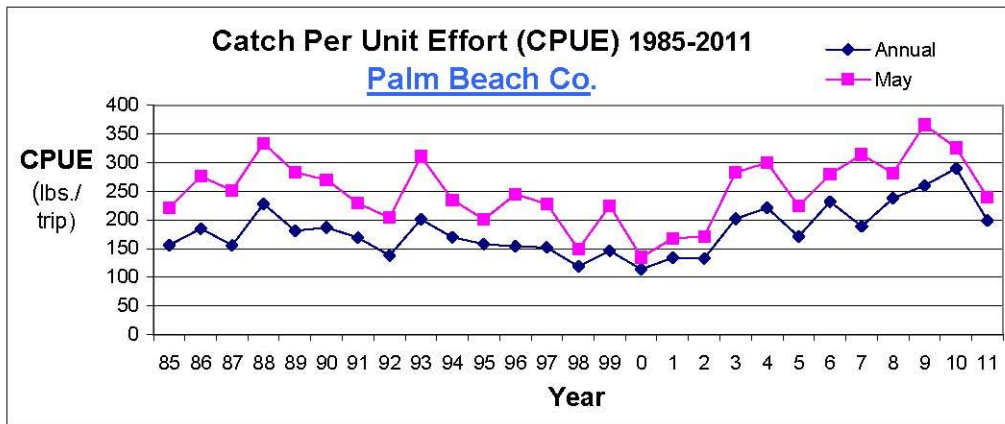


Data source: FL- FWC

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)



Data source: FL- FWC

Jimmy Hull, Chairman
SFA ECFS
JGH/pjb/rhh