

Florida Keys Commercial Fishermen's Association

P.O. Box 501404, Marathon, FL 33050

Phone & Fax: 305-743-0294 Cell: 305-619-0039
E-mail: FKCFA1@hotmail.com Website: FKCFA.Org

May 25, 2010

Dr. Steve Bortone, Executive Director
Gulf of Mexico Fishery Management Council
2203 North Lois Avenue, Suite 1100
Tampa, Florida 33607

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

Re: Amendment 18 Accountability Measures for King Mackerel in the Southern Sub-Zone Gillnet Fishery

Gentlemen,

Following a series of meetings among the gillnet fishermen, the most recent of which was on May 5, 2010 in Key West, Florida, 15 fishermen representing 17 permit holders in the king mackerel gillnet fishery met to discuss Accountability Measures in the fishery and their roles in developing a management plan that would be acceptable to the Councils. As a whole, we realize the importance of accountability, especially in our fishery where high volume catches are possible.

After much discussion, a series of steps were developed to prevent quota over-runs in what has become a very robust and healthy fishery. While the Gulf Council, at least at this time, is considering the carry-over of overage's to the following year's quota, we feel proactive steps on our part will do more to alleviate overages and provide for a well-balanced fishery.

The present allocation for this fishery is 520,000 pounds of king mackerel and there are currently 22 permit holders of record and we have classified 17 of those permit holders as active, meaning they have harvested a minimum of 20,000 pounds of king mackerel in at least one of the years between 2004 and the present.

The 17 active permit holders are fishing in the southern sub-zone of the eastern zone of the Gulf Migratory Group of king mackerel under the direction of 2 pilots operating spotter aircraft. With the exception of a lone dissenter, the permit holders have agreed to the following measures:

1. Both pilots will monitor daily catch reports for the vessels under their direction and report these totals to a designated industry representative.
2. The industry representative will be in daily contact with the NMFS SERO responsible for monitoring the quota and shall tabulate these totals on a daily basis and advise both pilots of the combined totals and their responsibility to relay that information to the vessels under their jurisdiction.

Office Physical Address: 6363 Overseas Highway, Suite #4, Marathon, FL

3. All of the fishermen, save one, have agreed to this system of collective monitoring of their catches. At this time, we do not feel this sole exception will be an impediment to the plan as outlined.
4. At 75% of the 520,000 pound quota (390,000 pounds) the industry representative will instruct the pilots to notify their fishermen to stop the harvest.
5. With 25% of the quota remaining, the fishermen will use a lottery, conducted by the designated industry representative. The number of vessels allowed to fish on any given day will be determined by how much quota remains to be filled.
6. When the quota is reached the industry representative will notify the pilots, who in turn will notify the fleet, that the fishery is closed. The industry representative will present the cumulative totals to the appropriate governing bodies and no one will fish during the time the quota is met and the fishery is officially closed.

In addition to the foregoing, we would request from the Councils a 3 year time frame to test the efficacy of these measures. We also feel some sense of urgency in defining active permit holders in the fishery using the 20,000 pound requirement in at least one of the years from 2004 to the present as the criteria.

At this time there are 5 vessels with gillnet permits that do not actively fish in the fishery. We are concerned that this latent effort which represents 23% of the permitted fleet of 22 vessels is a threat to the stability of the fishery and our plan as outlined above. We also feel an urgency to define active permit holders in the fishery by using a 20,000 pound qualifying criterion in at least one of the years from 2004 to 2010 as the criteria for eliminating this latent and potentially substantial fishing effort.

We firmly believe these steps can be effectively implemented and controlled by the industry and will bring an industry-wide solution to ensure effective management in the gillnet fishery. We respectfully offer these measures as our commitment to the Councils, NMFS and the fishery.

Please copy this letter to your respective full Councils and include this in your upcoming Council Briefing Books. Thank you very much.

Respectfully submitted,

Bill Kelly

Capt. Bill Kelly
Executive Director

