

# Florida Keys Commercial Fishermen's Association

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June 7, 2015

Dr. Pamella Dana, Chair & Committee Members  
Mackerel Committee  
Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Re: King Mackerel Framework Amendment 3, CMP Amendments 26 & 28

Dear Dr. Dana,

On May 6, 2015, the active permit holders in the kingfish gillnet fishery met in Key West, Florida to review and discuss alternatives proffered in Framework Amendment 3 and a review of CMP Amendments 26 & 28. Here are the results of that meeting:

**Action 1: Modify the Commercial King Mackerel Gillnet Trip Limit**

Industry Preferred: Alternative 2, Option 2b: Increase the trip limit to 45,000 pounds

95% of the strikes made in the gillnet fishery are less than 45,000 pounds, therefore an increase in the trip limit to that number resolves 95% of stakeholder problems, reduces chances of exceeding the trip limit and virtually eliminates the potential for excessive fines for even minor overages. The action will improve fleet efficiency, increase productivity and provide for greater safety at sea. By unanimous vote, all active, permitted, stakeholders agreed to request an increase in trip limits to 45,000 pounds and have verified their intent by signing the attached affidavit. Mathematically, at 45,000 pounds the current quota could be exceeded on the first day of fishing. However, in the entire history of the fishery the first day catch has never exceeded 250,000 pounds and typically averages about 200,000 or less.

**Action 2: Modify Accountability Measures for the Gillnet Component of the Commercial King Mackerel Fishery**

Industry Preferred: Alternative 1: No Action

Stakeholders felt none of the options presented in the amendment offered appropriate relief for fishermen. All of the stakeholders expressed willingness to volunteer overages provided underages would be allocated in the subsequent year's harvest. The discussion also addressed concerns over proposed reductions in the annual quota because of recruitment issues when millions of pounds of fish allocated to other sectors have been left unharvested for more than ten years.

**Action 3: Modify Electronic Reporting Requirements for Dealers Receiving King Mackerel harvested by Gillnet in the Gulf Southern Zone**

Industry Preferred: Alternative 1: No Action

Stakeholders saw no benefit to changing reporting requirements offered in Alternatives 2 or 3 and felt accountability measures and the increased level of communication developed over the past several years between stakeholders, port agents and NMFS/SERO provided real-time data gathering and a higher level of accountability.

**Action 4: Elimination of Inactive Commercial King Mackerel Gillnet Endorsements**

Industry Preferred: Alternative 3: Allow commercial king mackerel gillnet endorsements to be renewed only if landings for a single year during 2006-2015 were greater than 1 lb. Gillnet endorsements that do not qualify will be non-renewable and non-transferable.

For clarification, our intent is to maintain as active any permits with landings of 1 or more pounds in any year between 2006 and 2015.

**CMP Amendments 26 & 28**

- Stakeholders expressed disbelief regarding a proposed reduction in annual quota over the next 5 years based largely on an aging fish population and lower recruitment. Obviously, there is something inherently wrong with the models being used for the assessment especially when approximately 3 million pounds of allocation to the recreational sector have been left unharvested annually for 10 years. We urge the Councils to readdress the assessment and science indicating a need for such drastic cuts.
- Stakeholders support a recommendation for the new dividing line between Gulf and South Atlantic stocks established as the Miami-Dade/Monroe County line on the Atlantic side.
- Stakeholders support reallocation of unused quota from the recreational sector to the commercial sector until such time as the recreational sector has demonstrated a need for additional quota along with careful monitoring of the proposed recreational trip limit from 2 to 3 fish per person per day.

Dr. Dana, thank you for the opportunity to address these issues and provide comment to the committee as we continue to work with the Councils to enhance and streamline the rules and regulations governing this fishery.

Respectfully submitted,

*s/ Bill Kelly*

Capt. Bill Kelly  
Executive Director

C: Mr. Kevin Anson, GMFMC  
Dr. Roy Crabtree, NMFS/SERO  
Mr. Doug Gregory, GMFMC  
Mr. Ben Hartig, SAFMC  
Mr. Bob Mahood, SAFMC

Affidavit In Support of a 45,000 Trip Limit  
 Gulf of Mexico – Southern Sub-Zone – Gillnet Fishery  
 May 6, 2015

By affixing my signature hereto, I hereby certify, I am a current permit holder or authorized representative of the permit holder in the Gulf of Mexico, Southern Sub-Zone Gillnet Fishery for king mackerel and support a trip limit increase to 45,000 pounds (whole weight) per vessel per day.

#	PRINTED NAME	SIGNATURE	VESSEL NAME	PERMIT #
1	George Niles	<i>George Niles</i>	Grand D	GN-5
2	Emilia Moran	<i>Emilia Moran</i>	lady Josephine	GN-11
3	Tom DAVIES	<i>Tom Davies</i>	lady	GN-12
4	Edward Bowen	<i>Edward Bowen</i>	HIGH BRIDGE	GN-14
5	Suan Moran	<i>Suan Moran</i>	LEWIS & LILL	GN-20
6	Richard Dingz	<i>Richard Dingz</i>	THOMMY	GN-17
7	William T. Gibson Jr	<i>William T. Gibson Jr</i>	Spirit Team	584980-GNH
8	Frank Arencibia Sr	<i>Frank Arencibia Sr</i>	Aileen	GN-6
9	SANTANA AMADOR SR	<i>Santana Amador Sr</i>	Aileen II	GN-16
10	CHARLES CARTER	<i>Charles Carter</i>	Newport	GN-15
11	William A Carter	<i>William A Carter</i>	KERISTY	GN-3/GN-13
12	Michael Birren	<i>Michael Birren</i>	Brandi Lee	GN-24
13	Richard Shojitz	<i>Richard Shojitz</i>	Get use to it	GN-8
14	Charles Penner	<i>Charles Penner</i>	Five House	GN-2
15	Romeo Hernandez	<i>Romeo Hernandez</i>	R 3 J	GN-19
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