Bernadine Roy

From: Meetings
To: Ryan Rindone
Subject: RE: Re: Amendment 26

Public comment received by Martin Fisher below. Pam has asked that it be distributed to all Council members.
-------- Original message --------
From: Pamella Dana <pamdana@yahoo.com>
Date: 04/06/2016 11:57 AM (GMT-05:00)
To: Marrtin@aol.com
Subject: Re: Amendment 26

Thanks Martin for sending. Can you get the Gulf Staff to send out your note today to the entire Gulf Council members ? As the Chair of the Mackerel AP, your input is important and represents the user group.

From: "Marrtin@aol.com" <Marrtin@aol.com>
To: royowilliams@comcast.net; captaindavidwalker@gmail.com; pamdana@yahoo.com; martmartha.bademan@myfwc.com; mfischer@wlf.la.gov
Sent: Wednesday, April 6, 2016 10:11 AM
Subject: Amendment 26

Goodmorning. I recently sent this to Leann, and hit the send button before I realized I didn't cc anyone

Goodmorning Ms Leann,

This is Martin Fisher writing to you regarding your wonderful idea about starting the process to create a tool which we can use to "trade" kingfish allocation between sectors so that we can fully utilize this stock.

However, I beseech and implore you to lead the Council with this idea OUTSIDE the parameters of Amendment 26 because if the Council votes to consider doing this then implementation of 26 will be delayed until 2017.

Gulf recreational and commercial anglers NEED these fish in 2016. As you know, the only way that can happen is for the Council to take final action at this meeting on A 26.

I don't know if you listened in on last week's Reef Fish AP Webinar. At the end of our discussing increasing the ABC for Red Grouper, we posed an agenda item for our AP's next meeting to cover how to get out of the FMP box of antiquated tools, and develop a plan for inter-sector v "trading" of allocation of any particular stock where one sector will have an underage in any given "fishing year."

It galls me that last year the recreational fishermen were shut down in October for red grouper when the commercial sector had an excess of red grouper allocation that was sure to be available, and in fact amounted to over 900k.

AND, even more distressing is that stock assessment models can not accomodate the fact that these fish were left in the water during SEDARs.

It's high time we figured out, (we're a group of smart people, aren't we?) how to do this, but PLEASE Ms Leann, let's do it AFTER we get A 26 in play. We need those fish to catch this fall.

I hope this line of thinking appeals to you. You also have a STRONG ally in me to advocate for this change in FMP structure. I will be happy to do whatever I can as chair of Reef Fish AP, and chair of CMP AP to ensure that there is plenty of room at the table for discussion of this idea.

Thanks Leann,

Martin Fisher

From: Tom or Lisa Marvel <marvelt@yahoo.com>
Date: February 24, 2016 at 3:42:10 PM CST
To: Ryan Rindone <ryan.rindone@gulfcouncil.org>
Cc: Pamella Dana <pamdana@yahoo.com>, "martha.bademan@myfwc.com" <martha.bademan@myfwc.com>, "john@blaylockoil.com" <john@blaylockoil.com>, "leann@bosargeboats.com" <leann@bosargeboats.com>, "david@walkerbusiness.com" <david@walkerbusiness.com>, "mfischer@wlf.la.gov" <mfischer@wlf.la.gov>, "mackattackben@att.net" <mackattackben@att.net>
Subject: Re: South Atlantic Mackerel Advisory Panel Report
Reply-To: Tom or Lisa Marvel <marvelt@yahoo.com>

Ryan

As you are aware I voted against the current AP proposal to reallocate the Gulf king mackerel quota under CMP Amendment 26. Given the importance of this issue I feel it is necessary for me to outline my opposition.

First, the proposal is an arbitrary reallocation of quota. There was never an attempt to use landing data, of any time series, to justify the change. In virtually every other fishery when quotas are either raised or lowered they are done so according to the established allocation percentages. Would the panel have been as willing to reallocate had it been a one million pound increase in the red snapper or red grouper quota?

Second, I was the only member present from the southern zone for the initial vote. Even if we had had a full quorum there are only 2 out of 17 members from the southern zone. Should the reallocation of quota between the zones be guided by a panel with such lopsided representation?

Third, under the current South Atlantic AP proposal (which I support) all four zones/sectors would receive an equal amount of the quota increase. Assuming a one million pound increase in quota that would translate to 250,000 pounds for each zone/sector. The resulting northern zone quota would be 428,848 pounds or a 240% increase over its current quota.

Lastly, using arbitrary , non-science based methods to reallocate quota sets a bad precedent and is not in keeping with how the Gulf Council has treated other fisheries in the past.

Tom Marvel

Vice Chair GMFMC CMP AP

Florida Keys Commercial Fishermen's Association

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E-mail: FKCFA1@hotmail.com Website: FKCFA.Org

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

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

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	George Niles	G and D	GN-5
2	Emilia C Poan	Emilia C Poan	lady Josephine	GN-11
3	Tim DANIELS	Tim Daniels	Lady	GN-12
4	Lonnie Birren		HIGH BIDDER	GN-14
5	Juan Pena		ILEANA L LILT	GN-20
6	Richard Diaz	Richard Diaz	TAMMY	GN-17
7	William T. Gibson Jr	William T. Gibson Jr	Gloria Jean	584980-GNH
8	Frank Arencibia Sr	Frank Arencibia Sr	Aileen	GN-6
9	Santiago Arencibia Jr	Santiago Arencibia Jr	Aileen II	GN-16
10	CHARLES CARTER	Charles Carter	NewBoat	GN-15
11	William A Carter	William A Carter	KERISTY	GN-3/GN-13
12	Michael Birren	Michael Birren	Brandi Lee	GN-24
13	Richard Stagitz	Richard Stagitz	GET USE TO IT	GN-8
14	Charles Renew	Charles Renew	FIVE HOUSE	GN-2
15	Romeo Hernandez	Romeo Hernandez	R & J	GN-19
16				
17				
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