

Subject: Amendment 20

Date: Friday, August 23, 2013 8:22:08 AM Eastern Daylight Time

From: Randy Wamble

To: Gulf Council

My name is William R. (Randy) Wamble from Naples. My first commercial kingfish trip was in 1974 continuing through today. Hook and line fishing is my only income producing job. I am against changing the trip limit to 3000# in the Eastern Southern Sub- Zone. I am for keeping it at 1250# with no 500# reduction when 75% of the quota is reached. This trip limit was put in place to lengthen the season and potentially raise ex-vessel prices. It did both and to raise the trip limit would be a step backwards. It would shorten the season most likely to a January closure and no one can argue that would result in lower prices. After 15 plus years with the current limits, the fishermen still in this fishery are the ones who have tailored their businesses to be profitable under the current regulations. An increase to 3000# would also create a derby style fishery to no real benefit to anyone, even the people that think they want the increase. I have a 43ft boat, I'm no stranger to long distance runs, I have crew and I show a profit from this business. I have fished in the Western zone before and would have to go there again if our season here closes early because of a larger trip limit. I don't think the folks up there need anymore help filling that quota. There are no answers that are going to please everyone. Leave amendment 20 status quo. Forget tweaking a plan that everyone has made adjustments to. Leave it alone or go to an ITQ program.



8/13/2013

Gulf of Mexico Fishery Management Council
2203 North Lois Avenue, Suite 1100
Tampa, Florida 33607

Dear Gulf Council Member,

Please let me take this time to give you input from The Recreational Fishing Alliance - Florida West Coast on Coastal Migratory Pelagics Amendment 20 Boundaries and Transit Provisions.

Coastal Migratory Pelagics Amendment 20 Boundaries and Transit Provisions

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

We Support :

Alternative 3 : Set the commercial hook and line trip limit at 3000 lbs with no reduction.

Option B : For the Eastern Zone Southern Subzone.

Action 2 : Change the Fishing Season for Gulf Group King Mackerel for the Eastern and Western Zone

We Support :

Alternative 1 : No Action - The commercial hook and line season opens for both Eastern and Western Zones on July 1.

Action 3 : Establish Transit Provisions

We Support :

Alternative 4 : Allow transit through areas closed to king mackerel fishing for vessles processing king mackerel that were legally harvested in the EEZ.

Action 4 : Establish Regional Annual Catch Limitss for Atlantic Migratory Group King and Spanish Mackerel

We have no perferred alternative

Action 5 : Modify the Framework Procedure

We have no perferred alternative

Action 6 : Modify the Gulf and Atlantic Migratory Group Cobia Annual Catch Limits and Annual Catch Targets

We have no perferred alternative

Thank You for taking the time to look at our input

Capt Buddy Bradham
RFA- Florida West Coast
4000 24st N #1307
St Petersburg Fl 33714
727-458-1192
MotherOceanCharters@msn.com

I write to express my opposition to the proposed king mackerel trip limit increase (3000 lbs) for the southern subzone (Collier and Monroe Counties).

This is not a fine tuning of a trip limit, it is the abandonment of trip limit management. I am not a fan of such management and if the Council wishes to pursue alternative measures to stabilize this fishery I am all for it. I am a member of the king mackerel LAPP, which has yet to meet. However, to take an existing set of management measures that have been in place for 15-20 years and alter them, thereby redistributing the catch, is not right. It should be a foregone conclusion that either alternative 2 or 3 (2500 and 3000 lbs respectively) will result in a shortened season. In Collier County the fish often do not show until late winter or early spring. Even at 1250 the season often closes before the fish arrive. Furthermore it is most desirable to fish during Lent. At either 2500 or 3000 lbs we will never catch spring fish off Naples.

What are the goals of trip limits and where has the 1250 lbs limit failed? When the Council implemented these limits it was to ' reduce the derby effects and lengthen the season until a more permanent solution could be put in place'. These are the Council's words (paraphrased) not mine. If 1250 lbs were too restrictive the quota would not be filled : it is consistently filled. If the limit were too restrictive for a class of boats or one area within the zone you'd see shifting of landings: this has not occurred. If the landing limit were not restrictive enough one would see no difference in closure dates compared to pre- trip limit seasons: there has been a lengthening of the season compared to the early-mid 1990's.

The Council needs to be mindful that at this point in the game most of the Gulf fisheries are in some way interrelated. Like a balloon: you squeeze one side and the other pops out. If the limits are increased the season will shorten. Those of us that fish for both grouper and kings are now tied to grouper production levels via

the IFQ program. Our qualifying grouper landings were determined by how long the kingfish season lasted which in turn was determined by the trip limit. Shorten the season at this point and we can't compensate which increased grouper effort. What should we do? Go to Louisiana and fish kings thereby further overcapitalizing an already overcapitalized fishery?

Lastly, has the Council considered the prudence of establishing a 3000 lbs (or 2500 lbs) trip limit in a zone adjacent to a 50 fish zone?

Tom Marvel

F/V Sea Marvel

Member Mackerel AP (we voted to retain the existing limits)

My name is Jack Robinson—100 percent of my earned income is through commercial fishing.

The 2012 Gulf king mackerel season was a 53 day opener, a very short season because too many boats showed up; rent-a-boat, rent-a-captain and cheap fish prices. There will be more boats next year. Destin, FL panhandle 2012 season was very short as well. The same scenario: a lot of boats, rent-a-boat, rent-a-captain; one big party. I know the Gulf Council is aware of this problem, and I hope the Council will consider a historical qualifying endorsement, or catch shares.

The historical fisherman will not last with shorter seasons and cheaper prices. The part-timers and job-fisherman will; they can go back to their jobs. I don't understand...Washington wants a reduction in fleet, but the marine fisheries make it so easy to qualify for these permits. There are way too many king mackerel permits for such a small tack.

Amendments 19 and 20 are not good; a September 1 opening would be a disaster, and that would put the Gulf, panhandle, Naples, Key West, Florida east coast, and North Carolina fishing at the same time. It would just be an absolute disaster. The price of fish would crash, and would never recover as we went into the fall season. This is very, very bad for the fisherman. We need to get our king mackerel committee together and solve these problems. I do not know who came up with amendments 19 and 20, but I DO know that they are not in our user group.

Our stocks are taking a beating because of the huge growth of our king mackerel fleet. There are over 1,400 king mackerel permits out there. Should I do the math? There should only be 100 permits to be allowed an averaged earned income with our tack.

Please help the historical fisherman and their families. Please consider all that I have written, as well as my 25 years of experience as a king mackerel fisherman.

Thank you very much.

Sincerely,

Jack Robinson

Intelligence and Integrity

Intelligence and integrity are qualities you won't find in Roy Crabtree and company (NMFS)!

This is what is wrong with America today. Today our Government agencies are run by people with the morals of the common thief.

I was raised better than that!

Integrity: moral soundness; honesty; uprightness; rectitude.

Rectitude: rightness of principle or practice; exact conformity to truth, or to the rules prescribed for moral conduct.

I'm might not be intelligent, but I did the 9th grade in 45 minutes. I didn't go to school the last half year of the 12th grade. My last six years of school I did in four and a half years. I'm not slow!

I'm a man of honor and integrity! I volunteered to serve my country. I did six years and ten months in the Navy. I was an electronic technician those years. That job I was paid to use my brain. I doubt Roy Crabtree and company could do that job or that they served in the military, they lack the intelligence and integrity and honor required.

There's an old saying: nobody knows how stupid you are until you open your mouth. Roy Crabtree and company put their stupidity on paper. Amendment 19 and 20 are criminally stupid and will only complicate the problems in my King Mackerel fishery. I call amendment 19 and 20 criminal intent!

Integrity: My father flew the fastest jet bomber America (and the world) had in the 1970's. During the cold war my dad was given possession of nuclear bombs on dozens of missions. Believe me when I tell you that the U.S.A. military does not give these missions to people with less than perfect integrity!

My mother's intelligence and integrity equals that of my Father's. Besides raising seven children she was the president of the Silver hair legislator's for the state of Florida for three years. Before that she was a substitute teacher, a candy striper at school, a little league coach, a cheerleader coach, sold real estate and much more.

Three of my siblings are Intelligent. All my siblings are people of integrity and high morals. Alas I'm the black sheep of the family.

Believe me when I say that no one in the National Marine Fisheries Service measures up to Kane standards! I was raised better than all of you!

I was taught that you are responsible for your actions. That if you break it, you fix it, or you pay for a new one. Roy Crabtree and company are totally irresponsible!

Roy Crabtree and company have destroyed my life with their incompetence. I used to fish King Mackerel twelve months a year. I've lost my three best months of fishing because these fools can't do simple math. In the past two years my loss totals \$100,000 to \$120,000.

I can do simple math. My calculations tell me there should be about 300 commercial King Mackerel permits in the U.S.A. There is not one person in the NMFS that can figure out how many commercial permits there should be with the small 8 million pound commercial quota.

This proves my point that there is not one person in the NMFS that possess intelligence and integrity! You cannot manage anything without doing the math!

We've had a mackerel committee for years. Why wasn't this committee used to create amendment 19 and 20?

Intelligence: 1. Act or state of knowing. 2. Capacity to know or understand; the intellect. 3. Information communicated; news; notice; advice. 4. Knowledge acquired; general information.

Amendment 19 and 20 were created behind closed doors. Without the knowledge that the problem in the King Mackerel Fishery is that there are over two hundred too many commercial permits in use. Intelligence what's intelligence? Read the previous paragraph sections 3 and 4!

I feel that amendment 19 and 20 is criminal intent. The NMFS intends to double or triple this commercial fleet with sport fishermen. They're throwing gas on a runaway fire.

Roy Crabtree and company have no integrity, just criminal intent to destroy our lives!

The National Marine Fisheries should be shut-down!

Roy Crabtree should resign. Roy Crabtree should do time. Roy Crabtree and company should be held responsible for their criminal incompetence.

We will see what Congress thinks of your shenanigans!

P.S. Roy Crabtree and company: may the fleas of a thousand camels infest your crotch!

Daniel C. Kane AKA Huri-Kane Dan 10-29-2012

Don't change the landing limits on the King Mackerel

I understand that the NMFS is thinking of changing the daily landing limits of King-mackerel in the Florida Keys. To increase the landing limit from 1,250 to 3,000lbs is not smart.

Last year the price for King mackerel in the Key's bottomed out at 80 cents a pound. At a 3,000lb limit this price will get down to 60 cents or less. Bait cost about a dollar a pound.

The reason the price of King Mackerel is so low in the Keys is the fish are not iced properly. The majority of these lobster-fishermen that King-fish down there won't ice their fish until they are done fishing. I've spent over ten years commercial fishing west of Key West. I was down there King-fishing three years ago, and again five years before that. They wouldn't take proper care of their fish in the 80's, in the 90's, nor the last couple times I was down there.

Don't change the dates on any of the zones or the landings will overlap. This will ruin the price of our fish.

Daniel C. Kane 10-30-2012

This is a bill for \$180,000

The incompetence of Roy Crabtree and company has cost me \$180,000 or better in these past few years!

They refuse to fix the problems that they created in my King Mackerel fishery!

I used to fish twelve months a year. Now I've lost my three best months of King-fishing because Roy Crabtree can't do simple math.

In five years they can't figure out how many King Mackerel permits there should be. How stupid can they be? I'd call it criminally stupid!

In the last two years I've lost my three best months of King-fishing. That cost me about \$110,000. The few years before that I'd lost \$70,000 or better by not being able to fish during lent.

With an eight million commercial quota there should be only 300 King Mackerel permits.

Today there are near 1500 commercial permits out there, a thousand of them are not being used. Roy Crabtree is doing everything he can to activate all these sleeping permits. Why would he do this when there are nearly 300 too many permits in use today? I call it criminal intent.

In lieu of the \$180,000 and the \$500,000 I'm going lose in the next nine years I'll accept 20,000 pounds of Gulf of Mexico Red Snapper IFQ's.

I was raised understanding that you are responsible for your actions. That if you break it you fix it. If you can't fix it you pay for it.

The NMFS should pay me for damages they've inflicted on me!

Your victim: Daniel C. Kane 10-30-2012

Subject: Mackerel # 20
Date: Friday, August 31, 2012 10:32 AM
From: Tom Marvel <marvelt@yahoo.com>
Reply-To: "tom marvel" <marvelt@yahoo.com>
To: John Milner <GulfCouncil@gulfcouncil.org>
Conversation: Mackerel # 20

Dear Members of the Gulf Council,

I strongly opposed the creation of a new subzone off Central Florida. Why is funding of proposed zone only from the Southern hook and line zone? What relationship does the Southern Zone have to the proposed zone? One would think the parent zone would be responsible for funding of a zone created entirely within its' borders. You would be shifting quota from vessels that have shown a dependence on these fish to vessels(zone) that has not demonstrated dependence. What is the need of this proposed zone? Central Florida, according to your table, has only been closed in two of the last seven years. The average landings over seven years is 40.500 lbs. Does this actually warrant the creation of a new subzone? The vast majority of king mackerel vessels in the Southwest Zone (Collier and Monroe) do not travel out of their zone to fish kings. Most of our alternative fisheries (grouper, stone crab and lobster) are under effort limitation programs: trap certificates for stone crab and lobster and ifqs for grouper/snapper. To a large degree our capitalization in these 'other' fisheries is a function of how much historical access we've had to king mackerel. If our king mackerel quota had been cut from 1999-2006 to create a new sub zone we would have spent more effort targeting, in my case, grouper. Hence my initial grouper allocation would have been larger. To alter our quota after we are more or less locked in to our alternative fisheries seems highly unfair.

Please do not increase the Southern subzone trips limits. I am certainly no fan of trip limit management but until a new approach (ifqs) are in place trip limits are all we have to prevent a mid January closure. Increasing the trip limit will create such a steep gradient between the east coast limits and the Keys that I am quite certain the effort shift will all but overwhelm us.

Thank you

Tom Marvel

Member Mackerel Advisory Panel

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
3/22/2012 16:16:46	matthew andrews	restless146464@yahoo.com	matthew andrews owner operator of the fv restless2 The council should consider that opening the king mackerel season in the fall would create a tremendous flood of fish on the market in a very short period of time . Due to the fact that the fish are more plentiful and somewhat closer to shore. Vessels that have not historically participated in this fishery Will start participating .This fishery is as it stands is already under a tremendous economical burden due to over participation allowing this fishery to open in the fall will create disastours consequences for the market.In short this is a really bad idea.The only true and fair soulution to this situation is a catch share progam tx capt matthew andrews	32578	Commercial Fisher
3/23/2012 8:57:53	Nicholas Patzig	pmsbigred1@yahoo.com	<p>Action 1. Yes the council should eliminate all the zones and establish a 500 lb trip limit in the gulf. if a boundary is necessary then it should stay where it is. gill nets should be eliminated. if all trip limits were the same then there would be less incentive for the east coast and keys boats to encroach in other waters. If those boats are allowed to travel then the fish that they catch could be taken from their home quota and not taken from the other boats home quota to further reduce the incentive to travel and take livelihood away from other boats.</p> <p>Action 2. no change in opening date.</p> <p>Action 3. no change make them sell their catch in the open zone. any change would only foster black marketing.</p> <p>Action 4 and 5. If zones must remain home zone must be declared at renewal and only 1 zone is allowed and what ever fish are caught by that vessel will be counted against that vessel home zone and not allowed to take quota away from other vessels and their home zone quotas.</p> <p>Action 6. 1 Gulf Quota And 1 atlantic quota and all trip limits at 500 lbs.</p>	Fort Walton Beach, FL 32548	Commercial Fisher
3/26/2012 10:07:21	samuel m baker	mikebaker15@yahoo.com	I oppose all new management options in regards to admendment twenty. In review of this ademndment the constaint them running through most of the options is effort reduction. Reduceing my rights and fishing options as to when and where I can produce King Mackerel as a vaild full time commercial fisherman. I due support a two for one permit plan and a poundage limit for latent permits. This method was used in the shark plan by HMS to qualify sharks permits and proved to be productive.	hobe sound fl. 33455	Commercial Fisher
4/9/2012 5:35:17	Mason Bowen	fpfirelb@aol.com	<p>I have never seen a proposed amendment so Biased in nature as this amendment. It pander's to some small groups participating in the fishery, and negatively impacts the much larger groups that support the King Mackerel Industry.</p> <p>When you are dealing with a species of fish as highly migratory as King Mackerel the participants themselves Must Have That Same Freedom. When there is no absolute certainty where these schools of fish will be located,(the fish move with water temperatures and food supply). It is then Absolutely Ridiculous to have to declare zones in Ignorance and would Negatively impact participants.</p> <p>Mason Bowen</p>	Sebastian,Fl 32958	Commercial Fisher

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
4/15/2012 19:51:41	dennis gillispie	dgledge@gmail.com	Dear amendment 20 i oppose all action with the exception of triplimit deviation. that could help lengthen are fishing season.definitely no home zones or any zones for that matter we shouldnt be caged in like a pet thats a complete joke! not a good idea to change opening dates this would be true disaster we dont need easier fishing this would only entice more participation in the gulf.Get rid of the stagnant permits already, and also the 2 or 3 for 1 kingsih permit plan needs to be engaged asap should have been done yesterday.No state by state quota system not needed..no action on ammendment 20 please ,thankyou.	fort pierce fl 34946	Commercial Fisher
5/31/2012 13:03:50	Mark Tryon	mdtryon@bellsouth.net	I fish out of Pensacola Pass in the Florida northern west coast subzone. Subsequent to the closure of the gulf west coast (AL to TX) zone NMFS has routinely failed to implement the step down from 1250 to 500 lbs in our zone. As such transient vessels have repeatedly wiped out our measly quota in short order each season. My recommendation here is to reduce the trip limit in our subzone to be relativeto the small quota. Perhaps 500lbs would be logical. In the interim it is imperative that NMFS does their job and implements the step down in a conservative manner. My suggestion would be to have the step down coincide with the closure of the Al-TX zone. Finally I would be in favor of a single zone declaration to protect local interests.	gulf breeze,fl. 32563	Commercial Fisher
6/29/2012 5:29:50	William R. Wamble	fish4living@comcast.net	Action 1. Leave the subzones in place. Leave the boundry lines in place. A 1500 lb. trip limit would help offset trip expenses in the Southern subzone, however any major increase in the trip limit would shorten the season and lower ex-vessel prices. The kingfish market is poor at best when everyone is catching fish at the same time and larger trip limits would likly cause market gluts and possible shut downs from buyers refusing to take more fish. Fishermen at times stop fishing because prices go below 1.00 per pound. We already have situations like this occuring each year. A reduction at the end to 500 lbs. is unnecessary and an unfair economic burden on fishermen who have proved their dependance on this fishery. If the subzones are eliminated, put the quota back where it came from. ACTION 2. Leave the opening date as it is. ACTION 3. Allow the transportation of legally caught fish through closed areas. This is another unnecessary economic burden on fishermen to have to travel long distances to sell their catch in open zones. ACTION 4. and 5. Locking fishermen into zones is another unnecessary economic burden on fishermen. The historical king fisherman, who has shown his dependence on this fishery, needs to be allowed to follow the fish if he so chooses. ACTION 6. How can any one state catch the entire Annual Catch Limit? With zones in place that have individual quotas? WHEN ARE WE GOING TO QUIT MICRO MANAGING THIS FISHERY? WHEN ARE WE GOING TO QUIT SECOND GUESSING OUR CURRENT REGULATIONS EVERY TIME SOMEONE WITH A NEWLEY PURCHASED PERMIT STARTS COMPLAINING ABOUT THE RULES? ITQ, ITQ, ITQ. ITQ, ITQ.....	Naples, FL. 34104	Commercial Fisher

Timestamp	Enter your full name	email address	Comments	City, State, Zip Code	Check all that apply
8/31/2012 7:23:46	Tom Marvel	marvelt@yahoo.com	<p>I strongly opposed the creation of new subzone off Central Florida. Why is funding of proposed zone only from the Southern hook and line zone? What relationship does the Southern Zone have to the proposed zone? One would think the parent zone would be responsible for funding of a zone created entirely within its' borders. You would be shifting quota from vessels that have shown a dependence on these fish to vessels(zone) that has not demonstrated dependence. What is the need of this proposed zone? Central Florida, according to your table, has only been closed in two of the last seven years. The average landings over seven years is 40.500 lbs. Does this actually warrant the creation of a new subzone? The vast majority of king mackerel vessels in the Southwest Zone (Collier and Monroe) do not travel out of their zone to fish kings. Most of our alternative fisheries (grouper, stone crab and lobster) are under effort limitation programs: trap certificates for stone crab and lobster and ifqs for grouper/snapper. To a large degree our capitalization in these 'other' fisheries is a function of how much historical access we've had to king mackerel. If our king mackerel quota had been cut from 1999-2006 to create a new sub zone we would have spent more effort targeting, in my case, grouper. Hence my initial grouper allocation would have been larger. To alter our quota after we are more or less locked in to our alternative fisheries seems highly unfair.</p> <p>Do not even think of increasing the Southwest subzone trip limits. We would see so much new effort our season would be closed by February.</p>	Naples	<p>Charter/Headboat For-Hire, Commercial Fisher</p>