

# Florida Keys Commercial Fishermen's Association

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April 12, 2021

Dr. Tom Frazer, Chairman & Members  
Gulf of Mexico Fishery Management Council  
4107 West Spruce Street  
Tampa, Florida 33607

Re: King Mackerel Gillnet Fishery, Gulf of Mexico, Southern Sub-Zone, Alternative Management Measures

Dr. Frazer & Council Members,

As they do every year, permit holders in the king mackerel gillnet fishery have held two formal meetings since January 2021, to review and evaluate the fishing season and discuss stakeholder practices deemed appropriate to the efficient prosecution of this high-yield fishery. These discussions have included consideration of various changes to management methods, including but not limited to: ITQs, IFQs, EFPs, VMS and Catch Shares. By majority vote, they have come to agreement on several issues, which I have been authorized to relay to the Council.

1. 14 of 17 permit holders are opposed to ITQs, IFQs, EFPs, VMS and Catch Shares.
2. All 17 permit holders, for ten years in a row, again petition the Council to address reallocation from the recreational sector to the commercial sector in order to comply with MSA National Standard 4 based on best available science.
3. If the Council is going to continue to require paybacks for overages in the gillnet sector, then all user groups should be held to the same standard. Otherwise, the requirement is discriminatory.

The stakeholders in this fishery have repeatedly demonstrated a willingness to work with the Council, including providing real-time catch data to monitor and regulate the harvest for compliance with ACLs.

In closing, we would like to express our sincere appreciation to Council Member John Sanchez for his invaluable guidance and research and also Dr. Jessica Stephen for providing additional information on these types of management programs.

Sincerely,

*/s/ Bill Kelly*

Capt. Bill Kelly  
Executive Director