



Florida Fish  
and Wildlife  
Conservation  
Commission

Commissioners

**Robert A. Spottswood**  
Chairman  
Key West

**Michael W. Sole**  
Vice Chairman  
Tequesta

**Joshua Kellam**  
Palm Beach Gardens

**Gary Lester**  
Oxford

**Gary Nicklaus**  
Jupiter

**Sonya Rood**  
St. Augustine

Executive Staff

**Eric Sutton**  
Executive Director

**Thomas H. Eason, Ph.D.**  
Assistant Executive Director

**Jennifer Fitzwater**  
Chief of Staff

Division of Marine  
Fisheries Management

**Jessica McCawley**  
Director

(850) 487-0554  
(850) 487-4847 FAX

*Managing fish and wildlife  
resources for their long-term  
well-being and the benefit  
of people.*

620 South Meridian Street  
Tallahassee, Florida  
32399-1600  
Voice: 850-488-4676

Hearing/speech-impaired:  
800-955-8771 (T)  
800 955-8770 (V)

MyFWC.com

February 22, 2019

Mr. Mike Luisi, Chair  
Mid-Atlantic Fishery Management Council  
800 North State Street  
Suite 2001  
Dover, DE 19901

RE: Chub Mackerel Amendment

Dear Mr. Luisi:

The State of Florida's Fish and Wildlife Conservation Commission (FWC) reviewed the public hearing document and staff recommendations for the Chub Mackerel Amendment (Amendment) to add Atlantic chub mackerel as a "stock in the fishery" in the Mackerel, Squid, and Butterfish Fishery Management Plan (FMP). The Mid-Atlantic Fishery Management Council (Council) is scheduled to take final action on this amendment at their March 2019 meeting. Prior to the Council's decision on actions and alternatives within the Amendment, the Commission offers the following comments.

FWC supports the Council's draft goals and objectives for the Amendment, which include (1) maintain a sustainable chub mackerel stock; (2) optimize economic and social benefits from utilization of chub mackerel, balancing the needs and priorities of different user groups; and (3) support science, monitoring, and data collection to enhance effective management of chub mackerel fisheries. However, we do not believe the Fishery Management Unit (FMU) needs to encompass the entire region for Atlantic chub mackerel, Maine through Florida, to achieve these goals and objectives. Therefore, on behalf of FWC, I request the Council accept the Council staff recommendation and select Alternative 2.B.ii and define the FMU as federal waters from Maine through North Carolina.

Commercial and recreational landings of chub mackerel from South Carolina through east Florida account for 0.3% of all Atlantic chub mackerel landings. Off east Florida, there is no directed fishery for chub mackerel. Annual commercial landings in east Florida have not exceeded 1,300 pounds and average 378 pounds annually from 2000 through 2018. The Marine Recreational Information Program has chub mackerel recreational harvest estimates for only four years over this same period for east Florida. The recreational estimates range widely and, because the percent standard errors associated with these estimates are greater than 95%, they should be used with caution.

The Commission acknowledges the acceptable biological catch (ABC) recommendation applies to Maine through Florida; however, we reason that an alternative management unit is justified because landings south of North Carolina are de minimis. Management of the fishery in the southern area is inconsequential to the draft goals and objectives of the Amendment, especially the goal to maintain a sustainable stock. Thus, as allowed under the National Standard 3 guidelines, a less-than comprehensive management unit is justified.

If the Council elects to define the FMU as Maine through Florida, I ask that you select Alternatives 2.E.i.a and 2.E.ii.a for the permit requirements for the area off South Carolina through Florida, and not require a Greater Atlantic Regional Fisheries Office (GARFO) permit for commercial or for-hire harvest of chub mackerel in this area. The National Standard 3 guidelines state that management measures need not be identical for each geographic area within the fishery management unit, if the FMP justifies the differences. The low level of chub mackerel harvest occurring off South Carolina through Florida, in contrast to the regulatory burdens associated with GARFO permit requirements, justifies different management for this area.

The proposed GARFO permit requirements and associated permit reporting obligations would be onerous and duplicative. All commercial landings in Florida are reported through the FWC's Trip Ticket Program. Commercial fishermen who possess federal permits for snapper grouper, dolphin, wahoo, king mackerel, Spanish mackerel, or Highly Migratory Species are also required to report all fish harvested through the NOAA Fisheries Southeast Fisheries Science Center's federal commercial logbook program. Beginning in 2019, for-hire vessels with a South Atlantic federal permit will be required to report their catch to the Southeast Fisheries Science Center. An additional GARFO permit requirement would create undue regulatory burden for fishermen while providing no biological benefit to the Atlantic chub mackerel stock.

Florida's commercial landings and for-hire catch data are available to the Council. Therefore, excluding Florida from the FMU and potential permit requirements will not prevent the Council from achieving the third goal of the amendment, which is to support science, monitoring, and data collection to enhance effective management of chub mackerel fisheries.

The FWC appreciates the opportunity to comment on the Chub Mackerel Amendment. If you have any questions regarding our comments or require any additional information, please contact me at [Jessica.McCawley@MyFWC.com](mailto:Jessica.McCawley@MyFWC.com) or (850) 487-0554.

Sincerely,



Jessica McCawley  
Director