

Dear SAFMC,  
11,2016

Feb

I am writing in opposition to the implementation of a control date of June 30, 2015 for the Commercial Sector of the Dolphin and Wahoo Fishery of the Atlantic. (FB16-007) As a newly licensed and permitted commercial fisherman in North Carolina, the effects of this unjust rulemaking would be devastating to my livelihood as well as others. I feel there are other management options that would have less of a negative effect on all parties involved, which I will discuss in this letter as alternatives for the Control Date of June 30, 2015.

After working in the commercial fishing industry and in other Agri businesses, I was able to purchase a commercial fishing license as well as my Dolphin/Wahoo permit in August of 2015 without any notification of a possible control date. According to the Federal Register, the SAFMC did not vote on a control date until the September 2015 meeting and was not even posted in the Register until Feb 4, 2016. All which were after I made the investments needed legally to harvest dolphin commercially. As a rod and reel fisherman, a large portion of my income is dependent on this sector and after thousands of dollars have been spent on licensing, permits, Federal Operator card, commercial safety gear, Commercial Vessel Registration, Vessel upgrade, and fishing gear it is easy to say that without the renewal of this permit my family and I will not be able to recover from the effects of this new rule. If a Control Date is warranted I ask the council consider a date no earlier than Feb. 4, 2016 the date of notification to the public, and realistically set a date closer to the ruling. This in turn would help satisfy both parties by "discouraging speculative entry" into the sector as well as honoring the permits of current fisherman. It is hard to understand that the register considers Feb 4, 2016 as "advanced notice" of a Control Date that is seven months before the notice was posted.

*"Agriculture, manufactures, commerce, and navigation, the four pillars of our prosperity, are the most thriving when left most free to individual enterprise."* Thomas Jefferson

As far as dolphin population is concerned, I have yet to find in my research or in the register any indication of a depletion in stock status. With dolphin being one of the fastest growing and most prolific fish in the ocean (usually reaching reproductive maturity within 4-5 months of age or approx. 8" in length) it stands to reason that population is not of large concern and able to withstand fishing. According to the International Union for Conservation of Nature, dolphin are classified as "least concern" for conservation. If there is an accurate stock assessment completed which justifies further management of the species then other alternatives should be explored. One alternative could be imposing a 20" minimum fork length for all states not just a few, which intern allows the smaller fish multiple chances to spawn before harvest. Given that one female dolphin can produce 100,000 to 1,000,000 eggs two to three times per year, this increase in minimum size would result in a large jump in population. Another option could be lowering the recreational limit by 2 fish per person or implementing per boat limits.

When it comes to commercial fishing for dolphin there are obviously different methods to harvesting these fish. Some methods have greater impact on the population than others and are less discriminate. An alternative to this could be the implementation of trip limits. With this reduction in harvesting it will help prevent overfishing thus helping population given the stock is in need of management and preventing season closures. But the fact that 95% of dolphin sold in the U.S. is imported from South and Central America and not more from local fisherman is an injustice in itself. We as Americans should be promoting the production of a

healthy product, buying locally, and creating jobs throughout the industry here in the U.S. instead of closing seasons and putting people out of work.

In conclusion, I ask that the council choose to not use the June 30, 2015 control date and to take no further action to control entry or access to the Atlantic dolphin commercial sector. Due to the lack of notice and substantial evidence of a depleted stock of Atlantic dolphin, it does not warrant a control date. Especially one that would not honor and grant renewal to current permit holders. The loss that current permit holders affected by this date will have to pay is far greater than the benefit. Thank you for your consideration on this matter, it is not an easy job but if we work together we can find a common ground that benefits all parties. In the words of Capt. Keith Colburn of the FV Wizard when testifying before congress last year; *"I am a small business man in a big ocean and I need to go fishing"*.

Sincerely,

Nick Chiotakis

FV Ramblin Man