



NORTH CAROLINA MARINE FISHERIES COMMISSION DEPARTMENT OF ENVIRONMENTAL QUALITY

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Dr. Carolyn Belcher

Chair, South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

June 5, 2023

RE: Dolphin/Wahoo Regulatory Amendment 3

Dr Belcher,

The North Carolina Marine Fisheries Commission (MFC) would like to provide the following comments on Regulatory Amendment 3 to the Fishery Management Plan for the Dolphin Wahoo Fishery of the Atlantic.

The dolphin fishery is important to both the private recreational angler and the charter industry of North Carolina and is consistently ranked in the top five most targeted offshore recreational fish.

The North Carolina recreational angler and the for-hire industry requires different considerations compared to Florida, given the length of typical trips (>12 hours), the distance required to travel to reach suitable dolphin fishing waters (typically 45-60 nautical miles from shore), fewer target species available, and the higher-expenses associated with fishing offshore of NC.

Amendment 10 went into effect in May of 2022 and immediately after, the Council began work on Draft Regulatory Amendment 3 that proposes the same management options considered in Amendment 10 but were not selected (vessel limits, bag limits, size limits). In addition, there is no clear biological need for additional restrictions on the tail of Amendment 10. Any additional restrictions proposed in Regulatory Amendment 3 will result in a reduction in landings almost entirely from the North Carolina charter fleet and will cause unnecessary and inequitable economic damage to the industry.

We urge the Council to consider that climate change may be impacting dolphin migration. Although unpublished, the South Atlantic Vulnerability Analysis indicates that dolphin have a very high potential for a change in distribution resulting from climate change. The Council should also consider that dolphin are part of an international fishery where very little data exists on removals by other countries.

Lastly, there is an ongoing Management Strategy Evaluation (MSE) being conducted by the Southeast Fishery Science Center. The goal of the MSE is to develop an index-based management procedure that can provide catch level management advice and better assist evaluating future management strategies if needed. Workshops

were conducted along the Atlantic coast that gathered information from fishers about preferences, priorities, and concerns with the dolphin fishery. Workshops were held both in Wilmington and Wanchese, NC. Input gathered from the NC workshops included concerns about:

- Uncertainty in recreational catches
- Vessel limits
- Size limits
- Discard mortality and shark depredation

Additionally, spatial management, because of differences between NC and Florida and even differences between the Outer Banks fishery and southern coastal NC fishery should be considered while developing the MSE. It is very clear that after hearing the concerns raised in the MSE process, Regulatory Amendment 3 does not adequately address the concerns raised by NC fishers.

The MFC unanimously opposes any additional management measures through Regulatory Amendment 3 until final results of the MSE are available that determines additional need of management.

Sincerely,



W. Robert Bizzell, Chairman
North Carolina Marine Fisheries Commission

CC: SAFMC Members
John Carmichael
Myra Brouwer
John Hadley