

Summary of Public Hearing Comments on Amendment 10 to the Dolphin Wahoo Fishery Management Plan

(Based on comments received from January 17, 2021 through February 5, 2021)

Below is a summary of comments that were submitted electronically and received during the three public hearing webinars held on January 26th, 27th, and 28th. Comments provided during the webinars (n=23) are partially included in this document¹. Online comments (n=142) are available to view in full at: <https://safmc.wufoo.com/reports/Dolphin-Wahoo-amendment-10-comments/>.

Respondent Characteristics:

State	Number of Respondents ¹
North Carolina	78
Florida	51
South Carolina	19
Georgia	2
Mid-Atlantic Region	8
New England Region	6
Other	2

Affiliation	Number of Respondents ^{1,2}
Private Recreational	117
For-Hire	71
Commercial	29
Non-Gov't Organization	8
Wholesale/Dealer/Retail	3
Other	3

¹Includes online respondents and individuals that provided state and sector affiliation.

²Some respondents chose more than one affiliation.

The majority of comments focused on recreational retention limits for Dolphin and Wahoo but other actions in Amendment 10 as well as other topics were also addressed. A summary of the comments is provided below:

Annual catch limits and sector allocations (Actions 1 through 4)

- Some comments expressed general support for the Council's preferred alternatives.
- Consider a 5 percent buffer between the ABC and ACL if there is a concern over Dolphin abundance (**Action 1, Alternative 3**).
- Support **Action 1, Alternative 4** to address uncertainty over Dolphin landings, particularly in regard to international commercial fisheries. A precautionary approach is warranted.
- Support for maintaining commercial ACLs on pound basis (**Action 3, Alternative 2** and **Action 4, Alternative 3**).
- Support for **Action 3, Alternative 4** since U.S. commercial fishermen can offer a premium product for Dolphin compared to those that are imported and a reduction of 3% in allocation is not necessary at this time.

Recreational accountability measures (Actions 5 through 8)

- Some comments expressed general support for the Council's preferred alternatives.

¹ A transcript for public hearings occurring on January 26th is included. Transcripts for the public hearings on January 27th and 28th could not be developed due to technical problems with recording these hearings but the comments that were provided are included in the comment summary.

- In **Action 6**, support for Council’s **Preferred Alternative 5** with a reduced vessel limit.
- For the Wahoo recreational AM, consider a reduced vessel limit rather than a harvest closure (**Action 8, Alternative 4**). Also comments in favor of **Alternative 1 (No Action)** for **Action 8**.

Retention of Dolphin and Wahoo onboard commercial vessels fishing trap, pot, or buoy gear (Action 9)

- Support for allowing 500-pound Dolphin trip limit (**Preferred Sub-alternative 2b**) and also including Wahoo (**Preferred Alternative 3**).
- Could promote competition and conflict in Mid-Atlantic and New England regions between recreational and commercial vessels fishing pot buoys for Dolphin in same area. These buoys operate as fish aggregating devices (FADs). Support for a 250-pond Dolphin trip limit (**Sub-alternative 2a**) to mitigate these concerns.

Removal of the Operator Card requirement (Action 10)

- Several comments in favor of removing the operator card requirement (**Preferred Alternatives 2 and 3**).
- Maintaining operator card could encourage compliance with the new for-hire reporting requirement, particularly for captains that do not own the vessel (**Alternative 1 (No Action)** or **Preferred Alternative 3**).
- Previously burdensome to apply for and renew. Ability to apply online has streamlined the renewal process. Support for **Alternative 1 (No Action)**.

Recreational retention limits for Dolphin and Wahoo (Action 11, Action 12, and other measures)

- Notable regional theme to many comments. With some exceptions, those in favor changing retention limits (vessel limits, bag limits, size limits) were largely based in Florida or South Carolina. Those in favor of maintaining the current retention limits were often based in North Carolina.

Vessel limits

- Many commenters stressed the importance of maintaining the current vessel limit for Dolphin and bag limit with no vessel limit for Wahoo (**Alternative 1 (No Action)** in **Action 11** and **Action 12**), as a reduction would greatly harm the for-hire industry in North Carolina, particularly the Outer Banks (vessels fishing out of Oregon Inlet and Hatteras Inlet) and the southern Outer Banks (vessels fishing out of Beaufort Inlet).
 - Current retention limits are important to “justifying the cost of the trip” for many for-hire as well as some private vessel anglers.
 - Concern over notable economic hardship from reduced retention limits at a time when many in the for-hire industry have already faced challenges due to COVID-19.
 - Reducing retention limits could lead to more pressure on other species such as those found in the Snapper Grouper complex.
 - If retention limits are reduced, consider a regional approach rather than the entire Atlantic.

- Consider holding off on changing retention limits until several years of data from the for-hire logbook can be used to inform management decisions.
- Several comments in support of a reduced vessel limit for Dolphin (**Action 11**). Many expressed support for a 30 fish vessel limit (**Sub-alternatives 2a, 3a, and 4a**) and to a lesser extent 40 fish limit (**Sub-alternatives 2b, 3b, and 4b**). Commenters in support were largely based out of Florida and South Carolina, with some exceptions.
 - Varying opinions on whether reduced vessel limits should cover the entire Atlantic or only apply to certain states.
- Wahoo are an important species in the late summer and fall for private and for-hire vessels in the southern Outer Banks (typically fishing out of Beaufort Inlet). A harvest closure in the fall would be very detrimental. Wahoo is also an important recreational species in northeast Florida.
- Many commenters, particularly those from North Carolina, were not in favor of a vessel limit for Wahoo (**Action 12, Alternative 1 (No Action)**). If a vessel limit were to be implemented, consider a 12 fish vessel limit.
- Comments in favor of a vessel limit for Wahoo ranged from 2 to 8 fish per vessel, with many focusing on 6 or 8 fish per vessel (**Action 12, Sub-alternatives 3e or 3g**).
- Several comments in support of a vessel limit for Wahoo that would apply in Florida only. These comments were expressed both by commenters from Florida and North Carolina.
- Limited and varying opinions on different retention limits between private and for-hire vessels. Most that did comment were in favor of a higher limit onboard for-hire vessels.

Other retention limits (size limits and bag limits)

- While not currently considered in Amendment 10, there were many comments in favor of increasing the minimum size limit and/or extending the minimum size limit requirement for Dolphin to cover the entire Atlantic region. Many also commented on reducing the bag limit for Dolphin. Those in favor tended to be based in Florida and South Carolina while those opposed tended to be based in North Carolina.
- Size limits between 23” and 25” as well as a bag limit of 5 Dolphin per person was mentioned multiple times.
- There were some comments supporting a reduced bag limit (**Action 12, Alternative 2**) and relatively few supporting implementing a size limit for Wahoo. Support for a vessel limit on Wahoo was more common.

Filleting of Dolphin at sea onboard for-hire vessels in the Mid-Atlantic and New England regions (Action 13)

- Do not allow filleting of Dolphin at sea anywhere (**Preferred Alternative 1 (No Action)**) but if the action does move forward consider covering the entire Atlantic. Vessels in the South Atlantic often have to travel long distances too.
- Some support for allowing in the Mid-Atlantic and New England regions requiring skin on the entire fillet (**Sub-alternative 2a**) and two fillets being the equivalent of one fish for bag limit enforcement (**Sub-alternative 2b**).
 - Will help mates and is consistent with other regulations in the region.
 - Marinas often do not have facilities to accept fish racks.
 - Dolphin are easily identified by their skin so this is a good exception to the rule preventing fish from being filleted at sea.

Other topics and general comments

- Many commenters, often from the South Florida region, expressed a great deal of concern over a decline in the Dolphin fishery. Some, but comparatively few, expressed concern over the status of the Wahoo fishery.
- The fishery for Dolphin and Wahoo in northeast Florida and the Carolinas is very different from the fishery in South Florida. Access to the fishery off the Carolinas and north is limited due to long runs and generally rougher ocean conditions.
- Avoid harvest closures for both Dolphin and Wahoo where possible.
- Concern over the use of MRIP to set ACLs. Want to have better confidence and trust in the recreational data.
- Actions in Amendment 10 do not help further protect early life stages of Dolphin.
- Consider requiring the use of circle hooks when live baiting, drifting for, or “bailing” Dolphin.
- Concern over commercial longline and purse seine fishery for Dolphin.
- Consider involving Gulf of Mexico and Caribbean Councils. Also consider HMS management or international working group.
- Support for allowing for-hire bag limit sales of Dolphin.
- Consider a 2,000 lbs commercial trip limit for Dolphin.

PUBLIC HEARING WEBINAR COMMENTS

JANURAY 26, 2021

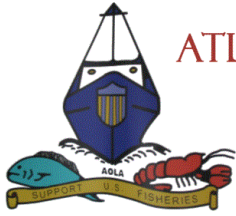
IRA LAKS: Ira Laks, charter commercial fishermen from Jupiter, Florida. I'd like to comment about the operator cards. January third, I probably would've said, Get rid of them. But when the reporting for the for-hire fleet went into effect on the fourth of January, I think some issues have arisen with operators who don't own their vessels and the penalty coming down on the owners of those vessels who don't operate there. I think the Council needs to reconsider the operator card. It may be a way to ensure that non owner captains have some skin in the game and are required to report accurately. It also prevents people every year from re registering their vessel in another name or another entity to get around. They're recording process, the reporting process. Just something that needs to be looked at. I think it needs to be not only for the Gulf, which would expand it, but should be required for the other for-hire fishery permits. Otherwise, there's no real incentive for people who don't own their boat. Have to go through the re-permit process to be engaged in this. Thank you.

DAVID WAMER: The Council should seriously consider a size limit, not just for Florida, but for all the regions. Because everyone who participates in this fishery has a responsibility to equally contribute to the health of the fish. And I think you've seen a comment saying that even the 20 inch size limitation may not be adequate to keep the health of the stock long term. I think the council should go back and reconsider the implementation of a size limit.

EUGENE JOHNSON: Thank you for the time and for your time today. I've just got one quick comment. I'm Eugene Johnson, and I fish recreationally here out of Jacksonville, Florida and also have an inshore charter boat that will run nearshore trips in the summertime when the weather is right. And it seems to me that a lot of that, from what I'm hearing, at least is that these annual catch limits. And a lot of the data that's being used to base these new regs on seem like it's just really hard for a public person, like myself to understand the MRIP data, and the data that's coming out of the Scientific And Statistical Committee. And so, I think, from the public's point of view, we would like to see more transparency there, where these numbers are coming from, how these numbers are calculated, especially for the recreational guys. Because, again, I don't mean to beat a dead horse but on the Snapper side, it's the numbers just seem way off and going back to Tim's comment we'd like to have confidence. And I think part of that confidence is understanding the data set, and how the data is being used, to come up with the annual catch limits. So my comment would really just be, we'd like to see some more transparency, and that maybe some links on the web, how the annual catch limits are calculated, specifically, and what data is being gathered, where it's being data gathered, how it's being gathered, and at what frequency rate it's being gathered to come up with these annual catch limits.

JAMES BERRY: I've read all the comments from everybody that has submitted a comment and I've heard tonight about the Dolphin fishery. It seems that everybody wants more fish and bigger of this. And it just seems to me that a size limit may be a sample affective way for us to get more fish out there. They can spawn. I don't know what the size should be, whether it's no, 18 inches or 24 inches. It just seems like that if, if folks were to release the small ones we would have more good fish. It would add more food to the next trophic level like blue marlin and big Wahoo and everything else. But it just seems like that might be a no brainer. Something to think about, and I know it's not in the amendment at this point, but it just seems like with a size limit

you get more fish that will spawn. You get a good class of fish. And, you know, perhaps we'd get really bigger sizes. I know, Dolphin do not live long, and a four year Dolphin is a trophy fish. Anyway, just my comments on that, since that really wasn't a part of the amendment. So thank you and have a blessed day.



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

Grant Moore, President
exec@offshorelobster.org

David Borden, Executive Director
dborden@offshorelobster.org

23 Nelson St Dover, NH 03820 | P: 603-828-9342 | www.offshorelobster.org | heidi@offshorelobster.org

January 20, 2021

John Carmichael, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
N. Charleston, SC 29405

Dear Mr. Carmichael,

I'm writing as representative of the Atlantic Offshore Lobstermen's Association (AOLA) to provide comments specific to Amendment 10, Action 9 to the Dolphin Wahoo fishery management plan. Members of AOLA are interested in this Action as it relates to modifying gear regulations to allow properly permitted lobster/Jonah crab vessels to possess Atlantic dolphin and wahoo.

As noted in my previous letters, it has been a long-standing practice for permitted offshore lobstermen to fish via rod and reel for pelagic and highly migratory species when they encounter the Gulf Stream during transits between lobster trawls. However, in 2016 it was brought to our attention that existing gear regulations prohibit this practice regardless of the vessel's permits, because lobster trap gear is not an authorized or exempted gear type in the dolphin/wahoo fisheries. Therefore, the Association supports the Council's Amendment 10, Action 9 preferred alternatives (2b and 3), which would modify gear regulations to allow for modest landings of dolphin and wahoo by permitted trap/pot fishers.

As noted in AOLA's previous comments and documented in Amendment 10, historic landings of dolphin and wahoo by trap/pot fisheries have been extremely low and we do not anticipate increased effort associated with this regulatory change, given that most of the species abundance in New England is located 80+ miles offshore where only a small number of trap/pot fishing vessels operate.

Thank you for your attention to this matter and inclusion of the gear regulation modification in Amendment 10.

Best Regards,

David Borden
Executive Director

cc: Rick Bellavance, NEFMC



Beyond Our Shores Foundation
Dolphinfish Research Program

PO BOX 3506
Newport, RI, 02840
(787) 436-8300
wess@beyondourshores.org
dolphintagging.com / beyondourshores.org

January 26, 2021

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

Dear Mr. John Carmichael and Council Members:

As the Director of the Beyond Our Shores Foundation, a 501(c)(3) formed to expand the Dolphinfish Research Program (DRP), an international angler-driven scientific capture-mark-recapture program for dolphinfish (*Coryphaena hippurus*), we would like to provide comments on this important draft amendment by first introducing policies that we support or suggest to be enacted to improve the proposed actions, then, second by addressing patterns and trends observed through our data collection. Using this approach, we hope you consider this constructive feedback meant to strengthen the amendment and overall dolphinfish conservation and management.

Expand 20" minimum size along U.S. East Coast

Anglers that have participated in the DRP are credited with successfully mapping out the migration of the species in the Western Central Atlantic Ocean (WCA) (Figure 1). With 717 conventional recoveries logged since 2002, we draw your attention to the extensive connectivity of this species between locations throughout the WCA, and when coupled with ocean circulation data (Figure 2), they show individual dolphinfish can reoccur in the same area semi-annually and annually. Of utmost importance for your consideration are examples of dolphinfish return migrants, which are fish tagged and released during summer along the U.S. East Coast between 18" and 21", or 2 to 3 whole weight pounds, and are recaptured along the same coast in a year subsequent to when tagged (Figure 3). These examples show individual fish grew between 10" to 33" while at liberty, which, when compared to average weight by length measurements for dolphinfish collected by the DRP, translates into fish more than tripling in weight for individuals at liberty for the shortest intervals or packing on up to 40 pounds for individuals at large for more than 300 days. These examples highlight the conservation benefit of releasing small fish within U.S. waters that can return within a year after considerable growth has occurred. While at liberty, these fish are able to reproduce at their maximum reproductive output for a greater amount of time, thus strengthening the spawning stock and annual recruitment. One key example I would like to share is that of a 20" dolphinfish tagged and released in June just south of the Outer Banks that was recaptured off Charleston, SC, 313 days later after growing 25" (see Figure 3 subpanel D). In order to reap the dividends from this species' early age of maturation (Perrichon et al. 2019), high reproductive capacity, fast



growth (Schwenke and Buckle 2007), and return migration tendency along the U.S. East Coast (Merten et al. 2014b; Merten et al. 2016), it is necessary at this time to include an action in this amendment to expand the current South Atlantic Bight 20” minimum size for waters from North Carolina to Maine. Please consider the addition of this action to Amendment 10 to give fish less than 20” the chance to advance reproductive capacity as well as return to the U.S. East Coast as larger return migrants.

Increase minimum size in Florida Atlantic Waters to 24”

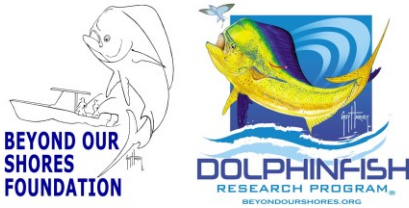
With recreational effort on the rise in the United States, globally (Cooke and Cowx 2004), and specifically for dolphinfish since the 1990s (Freire et al. 2020), enhanced management measures are additionally needed among the jurisdictions and locations that land the most amount of fish. As is the case in the Florida Keys, south Florida, and off South Carolina, historically once regarded as prime dolphinfish fisheries, these locations are now perceived (Figure 4) as waters with decreasing abundance, changes in size frequency and timing, arrival, and duration present for migrating fish. Indeed, Florida constitutes the largest proportion of annual landings of dolphinfish within the WCA (Figure 5), and therefore any enhanced conservation measures implemented in these waters will have a larger overall impact to diminish local depletion and contribute to regional benefits of a stronger spawning stock. As a result, we advocate for an increase in minimum size within Florida’s waters to 24”, the length at which 100% of dolphinfish are at maximum sexual maturity and reproductive capacity (Oxenford 1999), to help initially maintain local abundance once fish do arrive, then overtime lead to an increase in local stock health due to the additive value of locally enhanced and regionally pervasive conservation measures.

Require Circle Hooks when Bailing Dolphinfish

In September 2017, a survey was initiated through the distribution of a DRP newsletter. A total of 468 anglers responded. The majority of respondents were recreational fishermen (69.7%; n=421), had been fishing more than 12 years (66.7%) and embarked on more than 21 fishing trips per year (73.6%). While fishing for dolphinfish, the majority of respondents (52.8%) indicated the use of circle hooks while trolling only sometimes, versus never (25.7%), always (14.5%), or only during sight-casting or live-baiting (7%). However, 91.4% of respondents indicated they would use circle hooks while fishing for dolphinfish if the DRP provided the tackle in tag kits. Only 8.6% indicated that they would not use this tackle even if they received it in free tag kits. Now is the time to require the use of circle hooks when vessels are engaged in bailing dolphinfish (casting to dolphinfish with live or cut bait from a drifting or slowly moving boat), to reduce discard mortality rates estimated between 15-40% (Rudershausen et al. 2019)

Approve Action 11 – Alternative 2 / Sub-Alternative 2a along entire U.S. East Coast

Survey data collected by our program indicate the perception of stock health varies by region in the WCA (Figure 4). Generally, anglers report a positive perception of the fishery when immediately adjacent to expansive areas of ocean with low directed effort toward dolphinfish fisheries; angler perceptions worsen as the number of jurisdictions with directed dolphinfish fisheries increase down current of major dolphinfish movement routes. Given the information presented above with regards to regional connectivity, circulation, and annual re-occurrence, it is of our view that the degree to which dolphinfish are seasonally depleted increases as



fish move toward the Loop Current from the Caribbean Sea or Gulf of Mexico, or into the Florida Straits via the Old Bahama Channel. Therefore, given that dolphinfish are linked in an annual cycle in the WCA, dolphinfish conservation and management measures should be established in areas of good or worsening stock perception (sources) in order to improve stock health in the locations with the worst perceptions (sinks). Therefore, we applaud the Council in including Action 11 in this amendment and support Alternative 2 and sub-alternative 2a. Please consider our arguments and enact this action for the entire U.S. East Coast. If sub-alternative 2a is implemented along the U.S. East Coast it would mirror the vessel and bag limit in the U.S. Caribbean Sea established by the Caribbean Fishery Management Council in 2010.

Approve Action 3 – Alternative 4 and Action 9 – Alternative 2 / Sub-Alternative 2a

Dolphinfish are subject to increasing commercial catches in the largest fisheries (e.g., Taiwan, Peru, Ecuador) (Kleisner 2008; Aires-da-Silva et al. 2016) and increasing demand in major seafood markets (e.g., China, United States, and European Union) (MSA 2016). Directed commercial landings are also significant, additionally supplemented by, indirect harvest in purse seine (Hall and Roman 2013) and longline fisheries (Lynch et al. 2018), but the total WCA commercial take remains unknown. For the latter, a decrease in relative abundance has been documented in U.S. Atlantic pelagic longline fisheries (Lynch et al. 2018). However, a considerable amount of uncertainty exists regarding how many dolphinfish are indirectly caught in all Atlantic pelagic longline fisheries, which have risen tremendously over the past 30 years both inside and outside of national jurisdictions (Figure 6). Given this uncertainty, with regards to Action 3, we support Alternative 4, which will decrease the U.S. commercial allocation by 2%. We do not support the preferred alternative because we feel U.S. commercial fishermen can offer a premium product compared to those that are imported and therefore did not feel a reduction of 3% is necessary at this time. Furthermore, with relation to Action 9, we would only support the Preferred Alternative 2 and sub-alternative 2a of a 250 pound trip limit for vessels holding trap, pot, or buoy gear to harvest dolphinfish or wahoo by hook and line if their activities cease in the presence of recreational fishing vessels engaged in the same activity at the same place and time to avoid sector conflict and competition. Furthermore, the use of circle hooks should be required for these vessels when fishing for dolphinfish and wahoo next to pots. In the Mid-Atlantic Bight, our tagging data indicate dolphinfish tagged (n=422) next to pots are generally small fish (range: 12” to 36”; average and SD = 18.08 ± 6.97” fork-length).

Approve Action 1 - Alternative 4

In the data presented in the minutes, the average annual landings for dolphinfish from 1994-2003 were 22,112,604 lbs., while from 2004-2019 they were 15,972,423 lbs. This represents a drop of 28% on reported landings, a trend that is readily discernable in the graphs. We do not see any indication that this trend has been recognized and taken into consideration in formulating alternatives for establishing the ACL. Therefore, it is not clear whether the objective of Action 1 is to maintain landings at the more recent level, achieve a return to those seen in 1994-2003, or something else. Given the level of uncertainty with regards to both recreational and commercial landings, especially as it pertains to direct and indirect international commercial fisheries, we feel that a precautionary approach is warranted and therefore support Alternative 4 of Action 1 to establish the ACL at 90% of the updated ABC.



Expand FMP to include the Gulf of Mexico

The strongest management plan for dolphinfish in the region (i.e., South Atlantic Fishery Management Council Dolphin/Wahoo Management Plan) only applies to a small portion of the species distribution yet we routinely document broad connectivity and annual seasonal reoccurrence. Despite the pronounced variability in recreational dolphinfish landings data collected in the Gulf of Mexico (GOM) since 1995, average annual landings are higher than that of the New England, a region where discussions indicate Amendment 10 will apply. In addition, GOM anglers have favored inclusion within the FMP on the SAFMC amendment 10 comment board. Therefore, please include the Gulf of Mexico Fishery Management Council in discussions to expand this FMP to cover the GOM. Stronger management actions for dolphinfish in the GOM can improve dolphinfish stock status in the Lower and Upper Keys, a location with the worst stock perception in the entire region.

Establish International Dolphinfish Working Group

Additional analyses on countries with directed commercial landings have revealed under- or mis-reporting trends. Data suggest that the largest single-landing sector in the WCA, the Florida recreational sector, may not hold that designation for much longer. Our research suggests that increasing commercial landings in some Caribbean nations over the past 5 years when combined with mis-reporting and under reporting due to current economic restraints (hyperinflation and fuel limitations in some nations) has forced some offshore fleets to land dolphinfish outside of their home country. Our tagging and genetic data have linked dolphinfish throughout this region with the U.S. East Coast, yet, with the exception of a recreational vessel and bag limit in Puerto Rico, there are no conservation or management measures for dolphinfish in these areas. Therefore, management is not considering the full impacts on the stock. Now is the time to work with international partners to strengthen data collection programs and improve management to ensure the future sustainability of the WCA dolphinfish stock.

Thank you for the opportunity to comment on this amendment.

Best Regards,

A handwritten signature in blue ink, appearing to read "Wessley Merten", is written over a light blue circular stamp.

Wessley Merten, Ph.D.
Director
Beyond Our Shores Foundation
Dolphinfish Research Program



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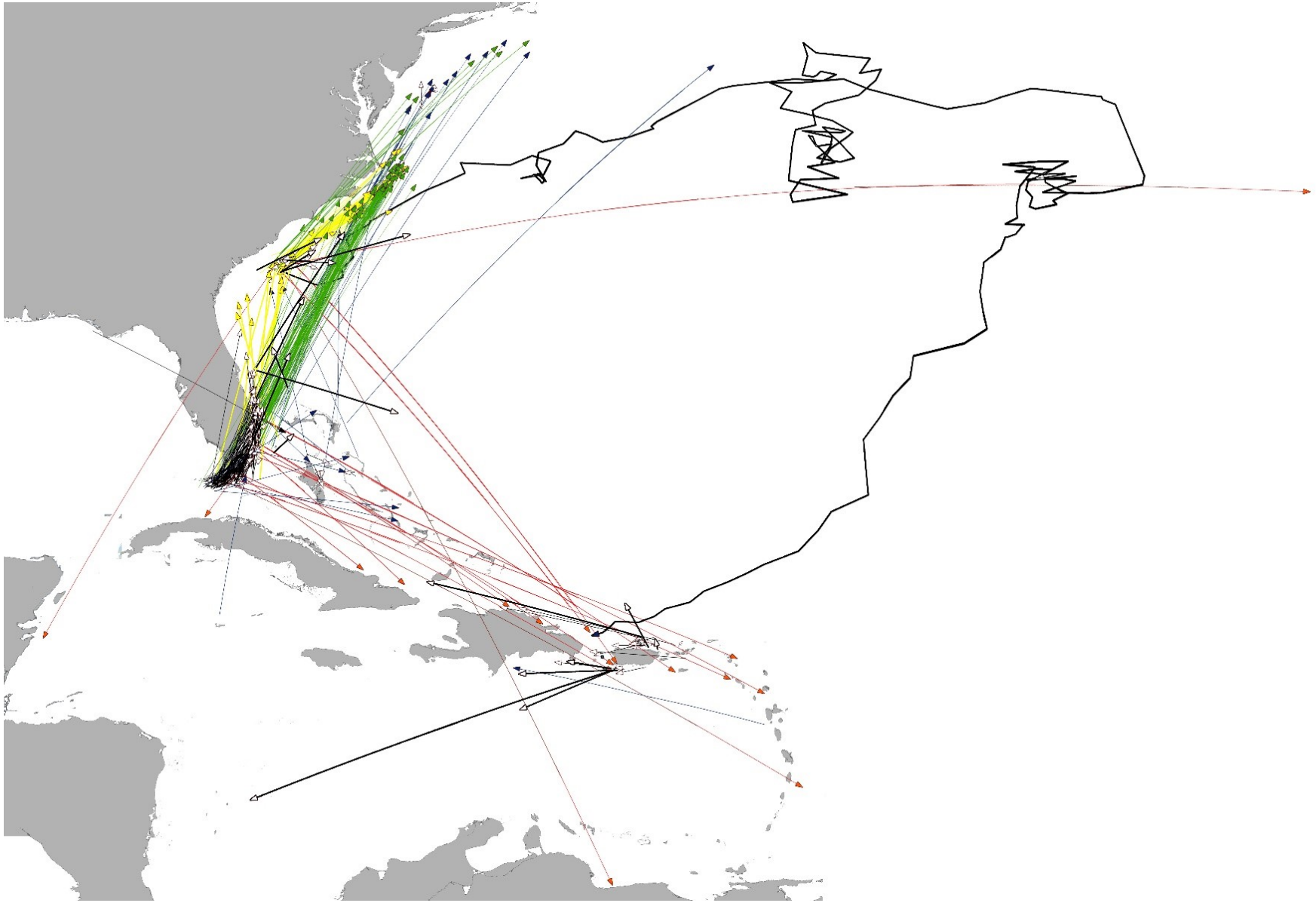


Figure 1 Straight-line horizontal movements of dolphinfish (*Coryphaena hippurus*) acquired from the majority of conventional (thin, colored, and black arrows) and satellite (thick, bold, and black arrows) tags in the Dolphinfish Research Program from 2002 to 2020 in the Western Central Atlantic Ocean, Caribbean Sea, and Gulf of Mexico. A 180-day geolocation track for a 43" bull is included as a thick black line. Movements (arrows) are estimates due to the broad scale of the map.

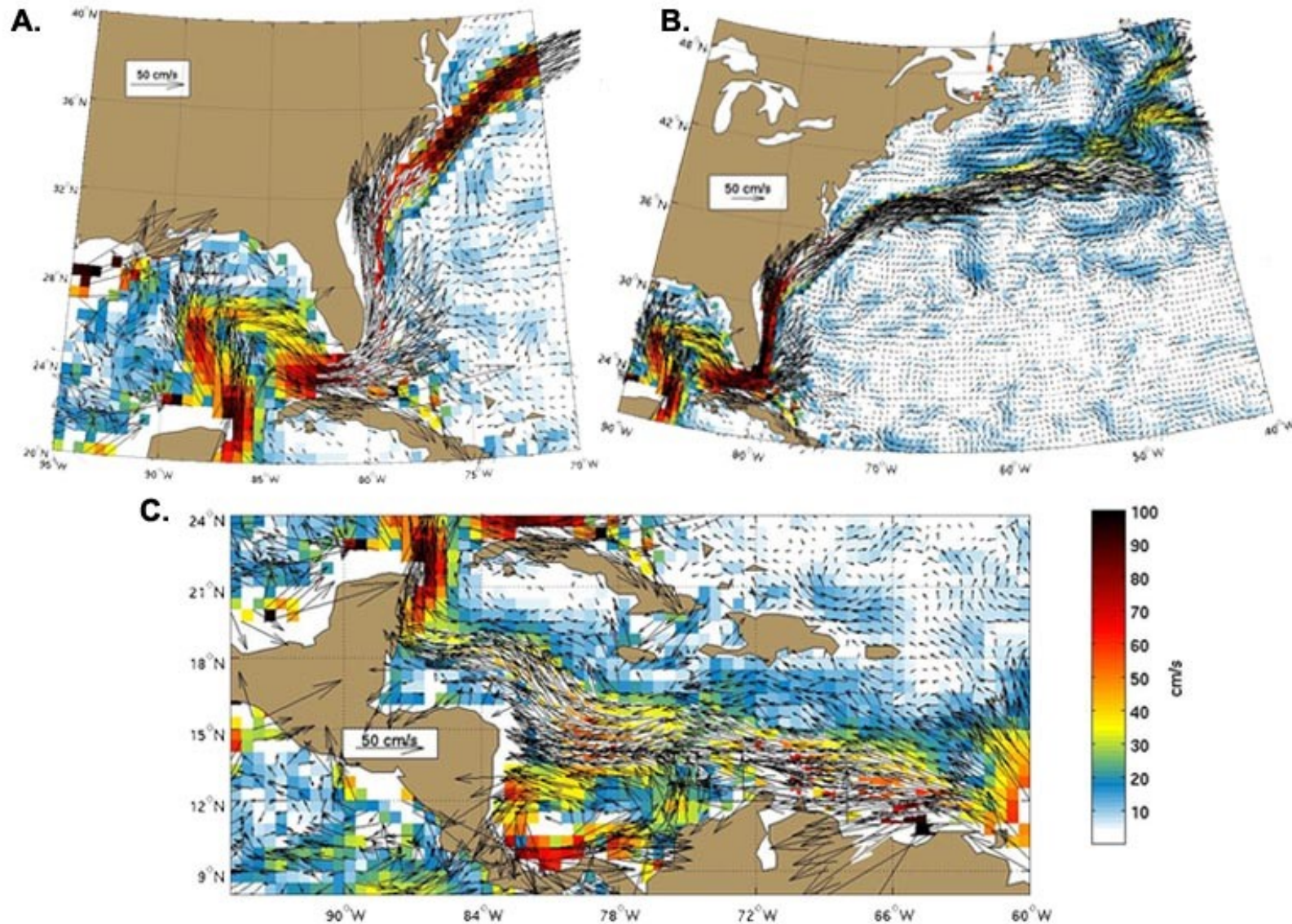


Figure 2 Annual means of surface circulation (cm/s) of the (A) Florida Current, (B) Gulf Stream, and (C) Caribbean Sea derived from analysis of surface drifters. This climatology was developed by Rick Lumpkin (NOAA/AOML) and Lucas Laurindo (Univ. Miami), in collaboration with Arthur Mariano (Univ. Miami), Mayra Pazos (NOAA/AOML), and Erik Valdes (CIMAS/AOML). Previous versions were developed with Gregory Johnson (NOAA/PMEL), Silvia Garzoli (NOAA/AOML), Jessica Redman (CIMAS), and Zulema Garraffo (Univ. Miami). Images taken from ftp://ftp.aoml.noaa.gov/phod/pub/lumpkin/drifter_climatology/figures/Atlantic/.

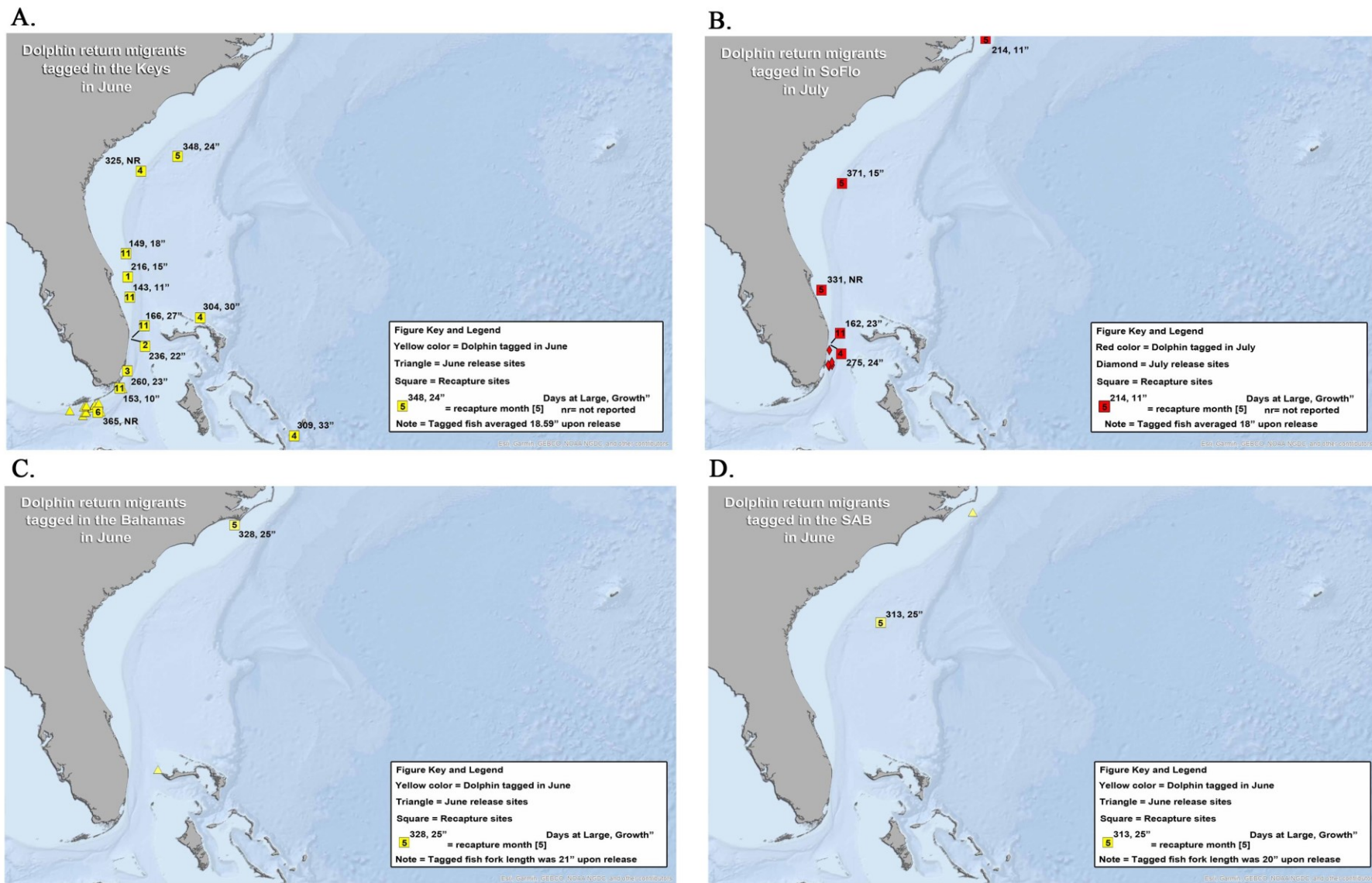


Figure 3 Tag and recapture details for fish that were recovered on the same coast where released in a year subsequent to when tagged. Examples are for dolphinfish tagged and released in the (A.) Florida Keys in June, (B.) South Florida in July, (C.) Bahamas in June, and (D.) South Atlantic Bight in June. See each sub-panel for additional tagging and recapture details.

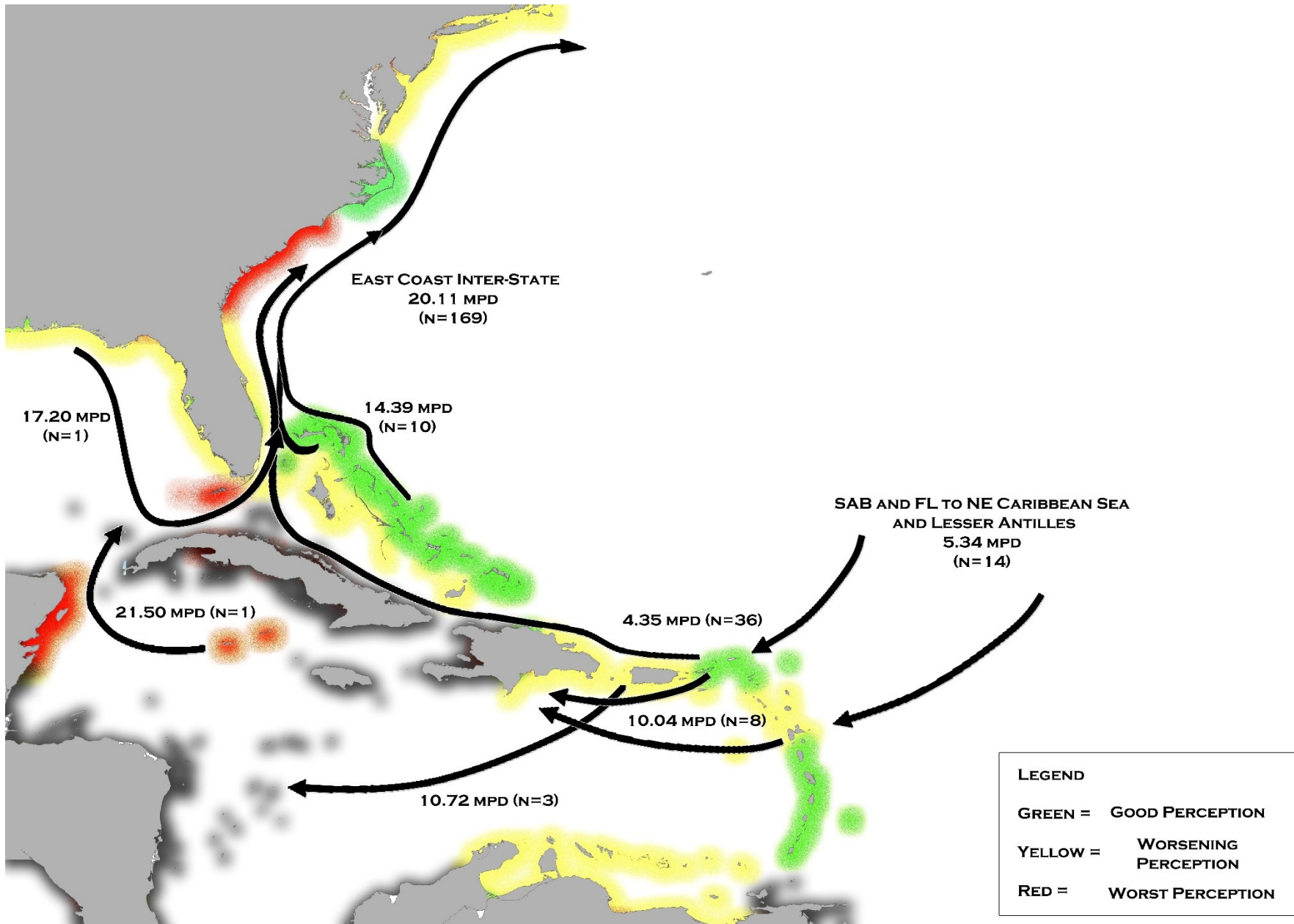


Figure 4 Dolphinfish stock status perception based on recorded public sentiment during South Atlantic Fishery Management Council (SAFMC) webinars, anecdotal survey responses (n=133) submitted on the SAFMC public comment board, and to the Dolphinfish Research Program (n=25). Theorized dolphinfish movement routes based on conventional and satellite tagging observations are included. Each theorized movement route is presented based on documented conventional and satellite tag movements. Coastlines with a black shading indicate unknown perception.

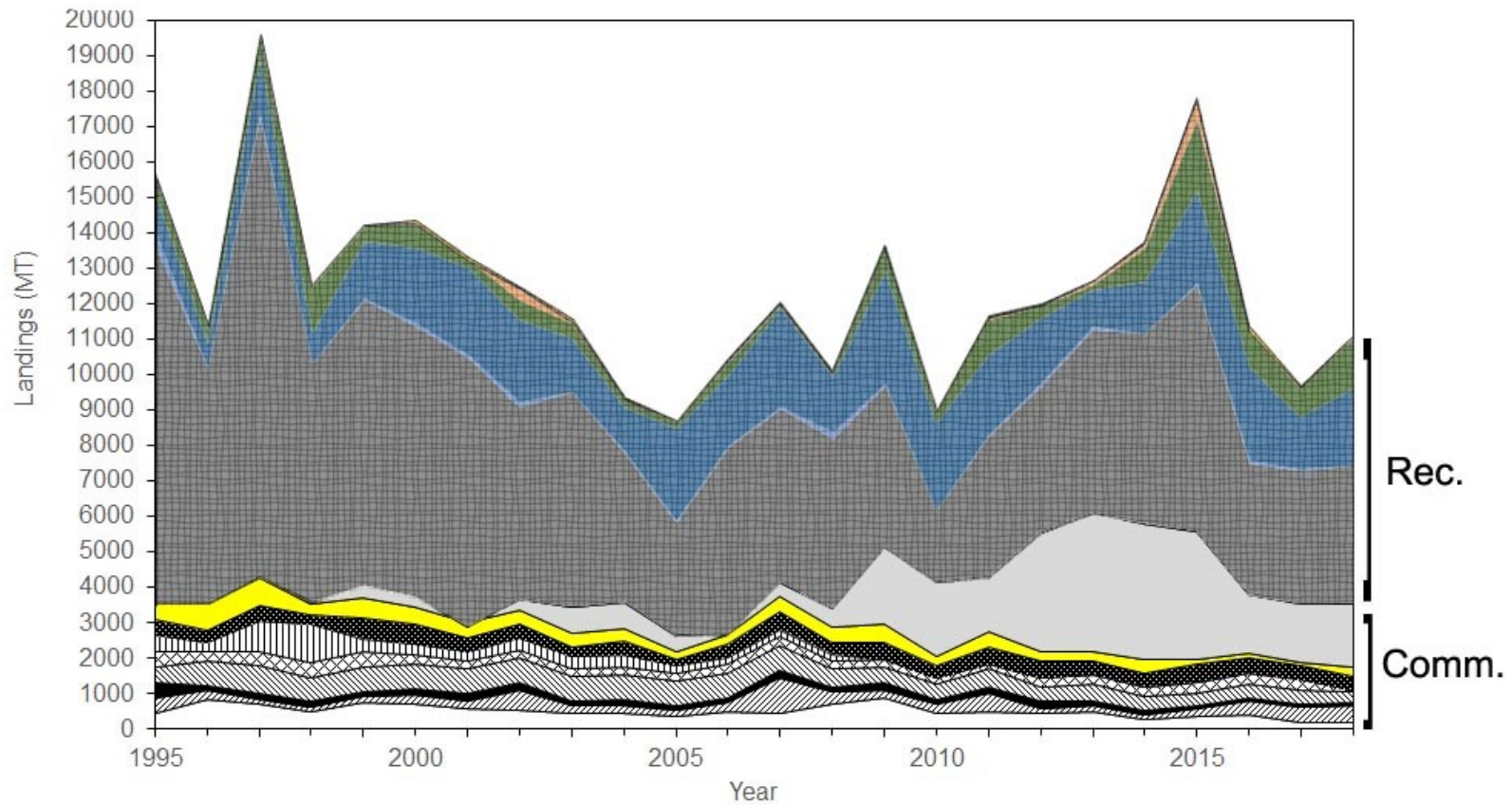
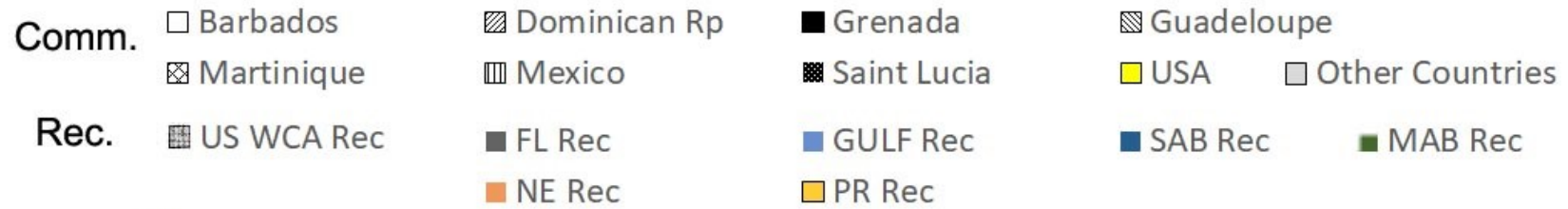


Figure 5 Western Central Atlantic Ocean commercial (comm.) and recreational (rec.) dolphinfish landings from 1995 until 2018 in metric tons from the Food and Agricultural Organization (FAO). Commercial landings are presented by country and aggregated by a group called “other countries” which consists of 15 nations that have sporadically reported dolphinfish landings from the beginning of the time period. The United States recreational sector (U.S. REC WCA) is presented as an aggregate (pattern) and broken down by each major Atlantic based recreational sector. FL Rec = Florida Recreational; Gulf Rec = Gulf of Mexico Recreational; SAB Rec = South Atlantic Bight Recreational; MAB Rec = Mid-Atlantic Bight Recreational; NE Rec = New England Recreational; PR Rec = Puerto Rico and United States Virgin Island Recreational.

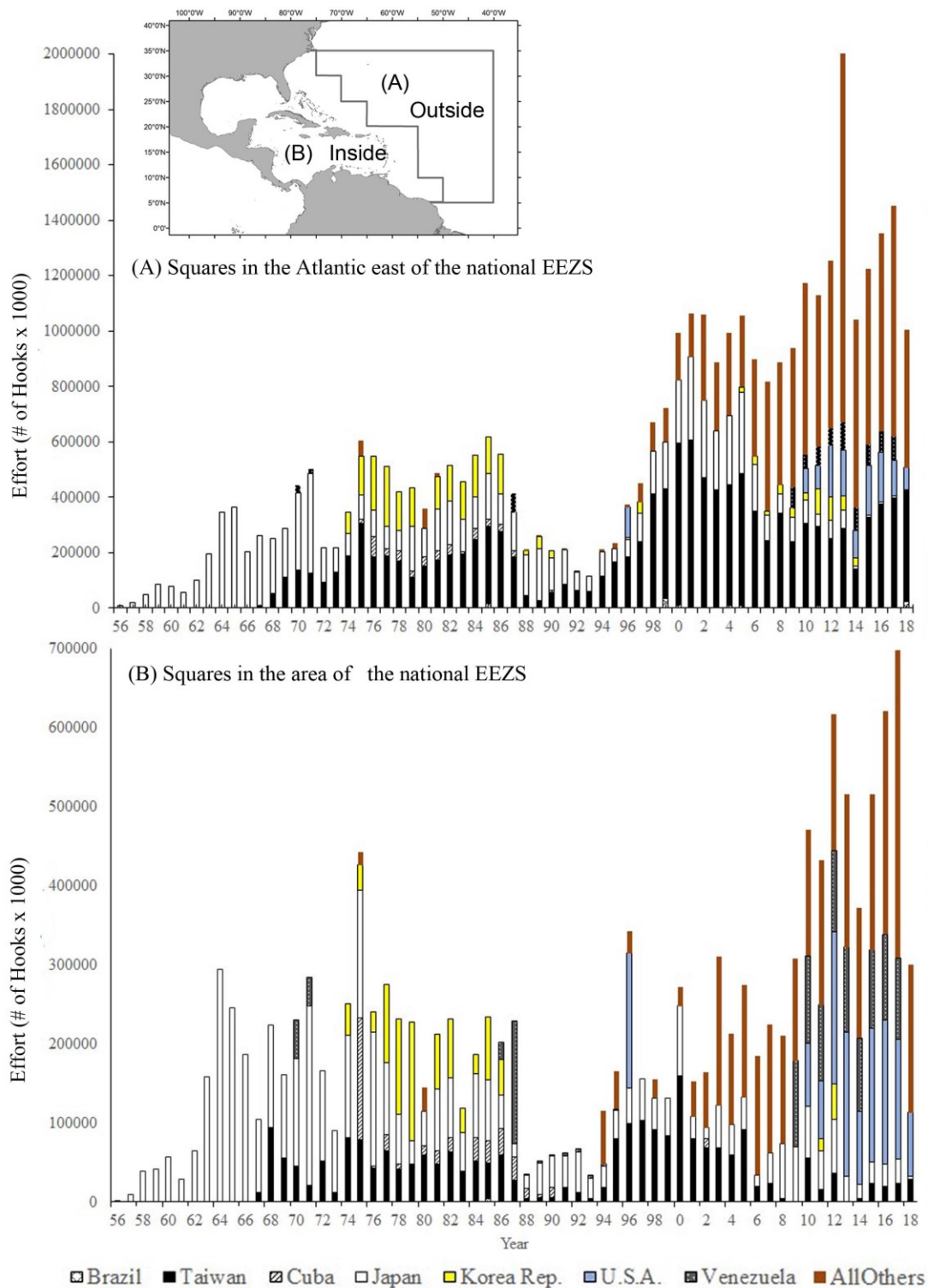


Figure 6 Atlantic pelagic longline effort (number of hooks x 1000) for the top 7 nations reporting effort to the International Commission for the Conservation of Atlantic Tunas (ICCAT) since 1956. A group called “all others” (red) includes nations that reported effort sporadically since the beginning of the time period. The methods used to develop this figure followed Mahon (1999) to illustrate the rise in effort (A) in the Atlantic Ocean east of national exclusive economic zones (EEZs) and (B.) within the area of the national EEZs.

Bill Collector Charters
1905 Clubhouse Dr
Morehead City NC 28557
(252) 725-1055

Council members: My name is Stephen Draughon. I have operated/ran Bill Collector Charters since 1994. It is a year round , full time For -Hire operation out of Morehead City NC. For ten years prior to that, I mated on charter boats in NC. During this time I have seen the many changes to our Fore- Hire fishery in NC and what the ramifications have been by decisions handed down by the Council.

Dolphin and Wahoo are the two most targeted species for us. April through September, with May through August being our prime Dolphin time. This is half of our charter season, Wahoo being our primary targeted species for the second half of our season. Although we catch Wahoo throughout the year, late August through Thanksgiving is prime time. Any reduction in bag limits to either of these species will be detrimental to NC For- Hire industry.

The Elephant in the room: NMFS has allowed open access longlining for Dolphin for several years. Here might be the issue that needs addressing instead of a reduction on the For-Hire industry!

In summery, like past actions taken by the Council, a reduction in one fishery will undoubtedly put additional pressure on another fishery. If the Council were to move forward with reduction in bag limits on the For - Hire industry, especially in NC, it will defiantly cause more pressure on Bottom fish and other species. We are financially strapped as industry in NC right now. Covid cancellations over the last year, local, state and federal government overreach and shutdowns. Does the Council really think this is a good time to implement tighter restriction on a already struggling industry?

Sincerely,

Capt. Stephen Draughon



Professor Arthur J Mariano, Ph. D.
U of Miami/RSMAS/Ocean Science
4600 Rickenbacker Causeway
Miami, FL 33149
amariano@rsmas.miami.edu

To the South Atlantic Fishery Management Council,

I am a professor of oceanography who has published papers on migratory fish such as dolphinfish and swordfish, president of The Hollywood Hills Saltwater Fishing Science and Social Club (HHSFSSC), and an avid fisherman for decades. The HHSFSSC brings together scientists (from the U of Miami Rosenstiel School of Marine and Atmospheric Science, Nova SE U Oceanographic Center, and NOAA AOML), hobbyist, recreational and commercial fisherman to discuss saltwater fishing and ocean science since 2007. Our club members include well-known captains such as Bouncer Smith, Skip Smith, and Tony DiGiulian. Many of my club members are senior citizens. We all remember how abundant dolphinfish were, and that they were relatively easy to catch. I use to go out and see large schools of dolphinfish associated with most convergence zones/weed lines you would find. The past few years most convergence zones have no fish. You can spend the entire day now running and gunning for dolphinfish and not find any fish. The club's unanimous consensus is that the number of dolphinfish has severely declined to a point that something needs to be done to bring this fishery back.

The The Hollywood Hills Saltwater Fishing Science and Social Club strongly recommends that the catch limit be reduced from 10 to at most 5 fish per person per day and from 60 to at most 30 fish maximum for a boat. It is well-known from tagging studies that dolphinfish are highly migratory. It is extremely important to the health of the fishery that the proposed fishing regulations changes be applied throughout the entire domain of the SAFMC jurisdiction. The dolphinfish regulations need to be uniform along the entire U.S. east coast. Given the large range of dolphinfish movement, it is crucial for the sustainability of this fishery that all anglers have the same set of regulations. It is also fair for all anglers to have the same regulations. Anglers in one state should not be allowed to over harvest this important resource.

There are also important economic reasons to reduce the catch limit in order to improve the dolphinfish fishery. Offshore fishing for dolphinfish is a major source of income for my home state of Florida. It brings in major tourist dollars to fishing captains, tackle shops, grocery stores, local hotels and restaurants. Protecting dolphinfish so that future anglers continue to come to Florida to catch the fish of their dreams is also protecting our economy which needs all the help it can get right now. Given that the scientific evidence and personal experiences of my hundreds of club members, who are very avid fishers with decades of log books, is so overwhelming that this fishery is in serious de-

cline, the HHSFSSC recommends without any reservations that our dolphinfish fishery needs reduced catch limits along the entire U.S. east coast. The new regulations should be passed and implemented as soon as possible in order to stop and reverse the trend of declining dolphinfish population. We would also recommend investing in satellite tagging of dolphinfish to learn more about this valuable fish. I can be reached at the email above if the council has any questions.

Professor Arthur J Mariano, 2/4/2021

A handwritten signature in black ink, appearing to read "Arthur J. Mariano". The signature is fluid and cursive, with a long horizontal stroke at the end.



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



February 5, 2021

Kim Iverson, Public Information Officer
South Atlantic Fishery Management Council
4055 Faber Place Drive, #201
North Charleston, SC 29405

Members of the South Atlantic Management Council:

On behalf of the more than 1,400 members of the West Palm Beach Fishing Club (WPBFC), I would like to submit comments regarding Dolphin Wahoo management. When surveyed years ago WPBFC members responded that dolphin fish were the number one species they targeted when fishing offshore. Our anecdotal observations based upon member comments and fish entries in our annual contests and tournaments is that dolphin fishing is not what it once was. Many WPBFC members especially lament the absence of big fish. In our view, yearly fluctuations in recruitment and migratory patterns are not to blame. Clearly there is more pressure from the recreational sector than ever before. Additionally, the WPBFC has growing concerns related to exploitive longlining efforts in not only the South Atlantic, but also the Caribbean. The WPBFC's recommendations are based upon our many decades of observations.

- The WPBFC supports a reduction in the recreational bag limit for dolphin from 10 per person, to 5 per person.
- We recommend that the daily recreational vessel limit for dolphin be reduced from 60 to 30 fish.
- The WPBFC supports the sale of dolphin and wahoo from the For Hire sector. We believe giving charter boats the ability to sell their catch supports local businesses like restaurants and fish houses, and it provides a sustainable supply of high quality fresh fish to local consumers.
- The WPBFC recommends a reduction in the commercial dolphin fish trip limit to 2,000 pounds per day.
- The WPBFC supports adopting a daily wahoo recreational vessel limit of 6 fish.
- We are against any proposal that would create seasonal closures for dolphin or wahoo.

We recognize that the management of pelagic species like dolphin and wahoo presents incredible challenges. We encourage the SAFMC to work more closely with the Gulf of Mexico and Caribbean Fishery Management Councils to help implement sustainable management measures throughout the fishes range since there is so much regional interconnectivity.

Tom Twyford

President



SAFMC
4055 Faber Place Drive
Suite 201
North Charleston, SC 29405

February 4, 2021

Dear SAFMC,

What is going on? I can't understand why right here in the middle of a Pandemic when everyone in the For-Hire Charter business is struggling to survive that you are going to put more restrictions on us. Is it not enough that we now have to electronically report everyday what we catch and how much money we take in? (which has nothing to do with net profit). It appears to me that before you even look at or analyze this real time, census-type data from the For-Hire Sector that you are going to put Draconian limit reductions if we don't stay below our ACLs. Are you ready for some of us to get in the unemployment/food stamp line? Because that is what is going to happen if you keep restricting us and driving charters away. We will not get them back. Why make us supply this data if you are not going to use it wisely? You have already separated out the numbers for the For-Hire Sector for the last 5 years for Dolphin and Wahoo. What is going to happen when our E logbooks show way over or way under on our ACL? Are you going to readjust the total ACL numbers up, or pat us on the back if they are under and tell us to keep up the good work. You now have in place an instrument that will give you an accurate, real time accounting of exactly what is going on with the For-Hire industry, so why not let it work for a year and then adjust our catch limit as needed.

According to your report, the overall # of Dolphin/Wahoo For-Hire permits has decreased over the last five years, and that is reflected in the ACL #s for the last five years. That # needs to be separated out and let us live with that # once it is confirmed by at least one year of E logbook data.

The private recreational ACL #s have been rising exponentially due to offshore boat sales, and I am excited for those fishermen and that industry, but we have no control over that or the amount of effort. (Weather is the big factor). In my opinion, the MRIP program has been very unreliable and inaccurate in estimating the private recreational catch and that margin of error is just going to get larger as the population of boats keeps increasing. Nothing should be done until you can get a better handle on what is going on in that recreational sector; restrictions may be necessary then.

The E logbooks should solve that problem in the For-Hire Sector. Just let the For-Hire have their own ACL and we will figure out how to live within it. For-Hire was not the problem to start with; we are not the problem now, and restricting us more is not going to be the solution.

I feel these things have to be taken into account before I can comment on the 13 actions proposed in Amendment 10. As I said above, the For-Hire Sector needs at least a year with the E-Logbooks and reports with accurate numbers, before any restrictions, if necessary, are placed on the Dolphin/Wahoo fishery.

Thanks for your time.

Capt Rom Whitaker

Capt Rom Whitaker
Board Member, NCWU
252-216-6106
rom@hatterasrelease.com

RM: mm

Board of Directors

Andrew Berry	Glen Hopkins
Perry Wood Beasley	Billy Maxwell
Capt Sonny Davis	Greg Mayer
Ernie Doshier	Jamie Reibel
Ernie Foster	Britt Shackelford
Tom Harper	Duke Spencer



AMERICAN FISHING TACKLE CO.

February 1st, 2021

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

Dear Mr. Carmichael and Council Members:

As the Chairman and CEO of the American Fishing Tackle Company (AFTCO), we would like to provide comments on draft Amendment 10 for the U.S. Atlantic Coast dolphin and wahoo fishery management plan.

In order for anglers to benefit from the early age of maturation, high reproductive capacity, fast growth, and return migration tendency for dolphinfish along the U.S. East Coast it is necessary at this time to include an action in this amendment to expand the current South Atlantic Bight 20" minimum size for waters from North Carolina to Maine. Published scientific literature estimates mature female dolphin (6-11 pounds or 27"-34" fork-length) can produce 100,000 to 200,000 eggs every other day. Growth data obtained through tagging estimate on average fish can grow a half an inch per week or just over two inches per month. While likely an underestimate, the tagging growth data suggest that a 16" or 18" dolphin, generally the smallest fish caught by recreational anglers, would grow for an additional 1-2 months before being legal size to be harvested. That would translate into a growing female to release millions of more eggs before being put in a fish cooler. Given the size of the Mid-Atlantic Bight recreational fishery and the growth of the New England recreational harvest of dolphin over the past several years, please consider the addition of this action to Amendment 10 to give fish less than 20" the chance to reproduce more as well as return to the U.S. East Coast as larger fish in the future.

Back in the late 90s, the use of non-offset circle hooks became the preferred terminal tackle to use when fishing recreationally for billfish species, not only due to non-offset circle hooks being nearly twice as effective in hook up rates but also because they drastically reduced fish being hooked in sensitive locations such as the roof of the mouth, throat, gills, or deep-hooked in the stomach. The vast majority of hook-ups with non-offset circle hooks were in the corner of the mouth, and when drop-back methods were eliminated when targeting species such as black marlin, foul-hooked fish became a rarity. Many species across the whole spectrum of gamefish benefit from using circle hooks and so could dolphin particularly when anglers are engaged in bailing. Bailing is an activity where anglers sight-cast chunk meat, live bait, jigs, or even bare hooks to a school of frenzied dolphin from a drifting or slowly moving boat. When anglers bail dolphin, fish are hooked up in much higher rates but are generally smaller in size and a proportion shake-off before being landed. Given that the U.S. Atlantic recreational fishery is the largest recorded sector landing dolphin in the Western Central Atlantic Ocean, and the only sector that engages in bailing dolphin, this sector has the greatest opportunity to minimize negative interactions with small dolphin when engaged in bailing by using non-offset circle hooks. A switch to use of non-offset circle hooks while bailing dolphin could lead to more fish surviving when they shake-off or after being released. Now is the time to include an action in Amendment 10 to require the use of non-offset circle hooks when vessels are engaged in bailing dolphinfish to reduce mortality rates when fish shake-off or are released.

AFTCO Mfg. Co., Inc.
American Fishing Tackle Company
2400 South Garnsey St., Santa Ana, California 92707
Phone: (949) 660-8757 Fax: (949) 660-7067 www.aftco.com

Given that dolphinfish are linked in an annual cycle in the WCA, we agree with Action 11 in Amendment 10 and support Alternative 2 and sub-alternative 2a. We would just like to reemphasize that because dolphin can move the entire U.S. east coast from Florida to Rhode Island on average in 44 days please enact this action for the entire U.S. East Coast. If sub-alternative 2a is implemented along the U.S. East Coast it would mirror the dolphin vessel and bag limit in the U.S. Caribbean Sea, a location that has been shown to be linked through dolphin movement data in as short as two months. Furthermore, the Council should consider expanding this fishery management plan to include the Gulf of Mexico so that vessel, bag, and size limits apply in all U.S. Atlantic waters for this important gamefish species. Stronger management actions for dolphinfish in the Gulf of Mexico could improve dolphinfish stock health in the Lower and Upper Keys, a location with the worst stock perception in the entire region.

Thank you for the opportunity to comment on this amendment.

Best Regards,

A handwritten signature in black ink, appearing to read "Bill Shed". The signature is written in a cursive, flowing style with a prominent loop at the end.

Bill Shed.
Chairman – CEO
AFTCO



Guy Harvey Ocean Foundation
10408 West State Road 84, #104
Davie, FL 33324

February 5, 2021

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

Dear Mr. John Carmichael and Council Members:

On behalf of the Guy Harvey Ocean Foundation (GHOF), we are writing today to encourage the Council to update management measures to increase protections for the ecologically and economically vital dolphinfish (*Coryphaena hippurus*).

As a highly migratory species, dolphinfish demonstrate high interconnectivity between states, regions, and nations. However, the disparity in current regulations between these areas have led to unequal opportunity for fishers, fewer and smaller fish, and decreasing landings.

Tagging and tracking data has shown that individual dolphinfish can reoccur in the same area semi-annually and annually. During these months at liberty, dolphinfish are capable of growing upwards of 33" and upwards of 40 lbs. Given this species' early age of maturation, high reproductive capacity, fast growth, and return migrations, expanding the South Atlantic Bite 20" minimum to waters from North Carolina to Maine would have a great conservation benefit and provide for more and larger fish for the anglers the following year. Please consider this addition to Amendment 10 to give fish 20" or less a chance to fulfill maximum reproductive capacity and increase both the size and number of dolphinfish returning to the U.S. East Coast.

Similarly, in the region where dolphinfish are most heavily fished in the Florida Keys, South Florida and South Carolina, and where anglers increasingly sense a depleting dolphinfish stock, the GHOF advocates for an increase in minimum size for dolphinfish in Florida's waters to 24". In a region with such high fishing pressure, this small change would have an even larger impact on the overall abundance of dolphinfish in U.S. East Coast waters.

Given the knowledge of regional connectivity, circulation and annual reoccurrence, dolphinfish have become seasonally depleted as fish move into Florida waters. Therefore, the GHOF supports Action 11, Alternative 2 and sub-Alternative 2a in the amendment.

On the commercial side, dolphinfish are subject to increasing commercial catches in the largest fisheries and increasing demand in seafood markets. However, a considerable amount of uncertainty exists in the true number of dolphinfish taken in the pelagic longline and purse seine fisheries. Given this uncertainty,

the GHOF urges the Council to accept Alternative 4 of Action 3, to reduce the commercial allocation by 2%. The GHOF also supports Preferred Alternative 2 and sub-Alternative 2a of Action 9 to establish a 250 lb. trip limit for vessels holding trap, pot, or buoy gear to harvest dolphin by hook and line if their activities cease in the presence of recreational fishing vessels engaged in the same activity at the same time to avoid sector conflict and competition.

Additionally, given the large uncertainty in dolphinfish landings, the GHOF encourages a cautionary approach and supports Alternative 4 of Action 1 to establish the ACL at 90% of the updated ABC.

The South Atlantic Fishery Management Council Dolphin / Wahoo Management Plan is arguably the strongest in the region but only applies to a small portion of the species distribution, despite the documented broad connectivity and annual seasonal reoccurrence. Therefore, the GHOF also encourages the Council to expand this FMP to the Gulf of Mexico and to consider actively working with other nations to better manage dolphinfish.

Thank you for the consideration of these changes for the betterment of the U.S. dolphinfish fishery.

Sincerely,

A handwritten signature in black ink that reads "Greg Jacoski". The signature is fluid and cursive, with the first name "Greg" and last name "Jacoski" clearly legible.

Greg Jacoski
Executive Director
Guy Harvey Ocean Foundation
954-424-6389
greg@guyharvey.com

Tom Roller
For-Hire Angler

Beaufort, NC

I am going to list my recommendation on Amendment 10 below, and I am going to comment briefly on two of the major issues.

Action 10 – operator card. The dolphin wahoo permit is the most owned permit in the south Atlantic and there are large numbers of boats that are not owner operated and even use multiple captains and crew. This presents a large potential problem in the form of reporting for the vessel if the owner and permit holder is not the one fishing. The main problem with the operator card was the difficulty and annoyance in applying for the card. It required getting passport photos every 2-3 years (and our state Drivers Licenses don't require photos but once every 5 or 10 years and our USCG OUPV licenses every 10 years) and application by mail. It is my understanding that the card can now be applied for online (my current card was renewed last year) and that has streamlined the process and made it easier and faster. If the card can be applied for online and the passport photos are no longer required – the frustration with this card should go away.

Action 6 – I was personally very frustrated when listening to council deliberations on this subject. As a North Carolina for hire fishermen, I can personally attest to how extraordinarily important the 60 fish bag limit is for both the for hire and the rec community. It sounds like a large amount, but 10 “bailer” dolphin per angler on a for-hire trip is a fair but not excessive catch on an expensive offshore charter. Given that Florida catches the majority of south Atlantic dolphin, reducing the bag limit only impacts the state of North Carolina while allowing Florida to face no regulatory impacts. I understand everyone is worried about a closed season, but this is not the way forward and is simply unfair to the anglers of North Carolina. We should be managing this in a more equitable fashion. If there is concern about the abundance of dolphin starting off by setting the ACL as 95% of the ABC would be a conservative starting point.

Action 1:

Preferred Alternative 2.

Action 2:

Preferred Alternative 2.

Action 3:

Preferred Alternative 3

Action 4:

Preferred Alternative 4

Action 5:

Preferred Alternative 5

Action 6:

No specific comment – see previous comments.

Action 7:

Preferred alternative 2

Action 8:

Alternative 4.

Action 9:

No Comment.

Action 10:

Alternative 1 – see above.

Action 11:

Alternative 1 – see comments above.

Action 12:

Implement a vessel limit and a 1 wahoo/person if necessary to achieve a year round season.

Action 13:

Preferred alternative 2 – NO I understand the argument made by elements of the charter industry here, and since I am very conscience of the difficulties of dockage and shoreside services, it is

my opinion that if large amounts of dolphin are to be retained it is reasonable to allow fileting at sea given the carcasses and skin on filets must be retained. Dolphin are easily ID'd by their skin so this is a good exception. It is my understanding this is common practice with some other fish species in the region.

From: Draughon(Bill Collector Charters)
Date: Wed, Jan 27, 2021 at 10:27 AM
Subject: Dolphin Wahoo
To: annabarriosbeckwith@gmail.com

Bill Collector Charters
1905 Clubhouse Dr
Morehead City NC 28557
(252) 725-1055

Council members: My name is Stephen Draughon. I have operated/ran Bill Collector Charters since 1994. It is a year round , full time For -Hire operation out of Morehead City NC. For ten years prior to that, I mated on charter boats in NC. During this time I have seen the many changes to our Fore- Hire fishery in NC and what the ramifications have been by decisions handed down by the Council.

Dolphin and Wahoo are the two most targeted species for us. April through September, with May through August being our prime Dolphin time. This is half of our charter season, Wahoo being our primary targeted species for the second half of our season. Although we catch Wahoo throughout the year, late August through Thanksgiving is prime time. Any reduction in bag limits to either of these species will be detrimental to NC For- Hire industry.

The Elephant in the room: NMFS has allowed open access longlining for Dolphin for several years. Here might be the issue that needs addressing instead of a reduction on the For-Hire industry!

In summery, like past actions taken by the Council, a reduction in one fishery will undoubtedly put additional pressure on another fishery. If the Council were to move forward with reduction in bag limits on the For - Hire industry, especially in NC, it will defiantly cause more pressure on Bottom fish and other species. We are financially strapped as industry in NC right now. Covid cancellations over the last year, local, state and federal government overreach and shutdowns. Does the Council really think this is a good time to implement tighter restriction on a already struggling industry?

Sincerely,

Capt. Stephen Draughon

From: Mitchell, Sam M.
Sent: Thursday, January 28, 2021 7:35 AM
To: SAFMC Administrator administrator@safmc.net
Subject: Comments on 1/26/21 Webinar

Although the webinar was slightly informative, I am ashamed for the council, to have so much information in the report that is based on ESTIMATED DATA. This is similar to the many different reports I have read and listened to regarding the Red Snapper regs currently in place.

For starter, none of this information either reported or planned for reporting should be considered until there are methods in place for accountability. Just like the snapper seasons, every individual wishing to participate should have to pay for additional benefits added to their current fishing licenses, requiring them to formally report. I know this is near impossible to control and only a few would actually comply or even be found guilty of non-compliance, but the accountability would be in place. Because of where (Fed water) the fish are typically located, any non-compliance would then become a Federal Offense, much stiffer, just like duck hunting. It is up to every individual to determine whether to abide by the rules or not. Personally, I have to because of my work, and right now cannot afford to lose my job. I believe that adding Mahi and Wahoo to the HMS permit is a very good idea. They (the fish) certainly qualify for consideration. The size limit for Mahi should most definitely be increased to allow “schoolies” more time to get a little bigger. I personally will not keep a Mahi unless they are 30 + inches. Reducing limit, GREAT IDEA. Charter boats will not be happy, but they are not the only ones out there. Limits for some of the Gulf regions are in dire need of establishing. Even though their home port may not have a limit on a particular species, the fish are being sought after and caught in Federal Water.

I do not wish to see any regulations revised allowing commercial fishing boats a quota for these GAME FISH. They are classified a game fish for a reason. I also totally understand the whole “bi-catch” problem, and if commercial boats encounter these species in their nets, they will likely perish. I do not support commercial fishing, and do not like it. I think there is only one thing in this entire world that I wholeheartedly DESPISE and that is long-line fishing. The decimation that takes place on those boats should be considered criminal. The rules are different for them and I realize they too are trying to make a living. It is my belief that it is the commercial sector that has challenged the red snapper, and also believe that the yellowtail are not far behind. I have sat and watched comm. Yellowtail boats put every fish in their boat they catch, without a question.

I think I have stood on my ‘box’ long enough, but I also believe that information is knowledge, and would love to continue to receive any updates or follow up meetings, etc.

Sam M. Mitchell
Waynesboro, Georgia

From: mail@pelagicsportfishing.com
Date: Thu, Jan 28, 2021 at 10:20 AM
Subject: Change in Wahoo and Dolphin Limits
To: annabarriosbeckwith@gmail.com

Good morning Anna. I do close to 150 charters a year here in Atlantic Beach. Wahoo has been the main fish that people come to catch and eat the last few years. A cut to one per person or low boat limits could realistically cut my business in half. North of us they have yellowfin to make their day. Just very few have been in our fishng area the last 10 years. Wahoo is what my customers really want. Dolphin of course is our second main fish. Limits on that could impact the amount of customers too. Anything I can do to help there be no changes please let me know. Thanks, Capt Mike Webb

From: Bennie Johnson jrsoffshore@gmail.com
Date: Thu, Jan 28, 2021 at 10:51 AM
Subject: Dolphin and wahoo limit's
To: annabarriosbeckwith@gmail.com

Anna,

My name is Junior Johnson. I have been in the Charter boat business all my life(30+ years). To propose a limit decrease on dolphin and wahoo would seriously hurt the charter boat industry especially our fall wahoo fishery and quite frankly don't understand why this is even being considered. Both wahoo and dolphin fishing has never been better in fact I think there are more wahoo that there were in the late 90's. With the prices of charters going up it's hard to imagine someone wanting to spend \$2000.00 + dollars to go out and catch one fish per person on a six passenger charter. Not sure what studies marine fisheries are going by to determine even considering this limit decrease , but I think they need to go back to the drawing board and listen to the people who are out there every day and actually catch these fish for a living.

Yours truly, Capt. Junior Johnson (Diamond Girl)

On 1/27/21, 9:59 PM, "Top Shelf Crew" info@topshelfsportfishing.com wrote:

This is Daniel Monette from topshelfsportfishing in Atlantic Beach North Carolina If these changes that are proposed go through it will greatly affect my business and my income seeing as how I am a full-time charter boat captain the reduction in mahi and wahoo will cause me to lose charters throughout the whole season which as we all know North Carolina Alina season is very short. This could potentially caused me to lose my business due to lack of customers which in return would cause me to lose my house. I am not for this change the charter boats are not because of the decline please take this into consideration thanks captain Daniel.

From: Mike Smarrito smarritom@gmail.com
Sent: Thursday, January 28, 2021 11:47 AM
To: SAFMC Administrator administrator@safmc.net
Subject: Dolphin Wahoo Amendment 10 Comments

I am writing to follow up on the discussions that occurred on 1/26/2021.

There were questions from participants on how the recreational catch numbers were calculated. A solution to obtain more accurate counts throughout the region would be to seek volunteers and have them staged at boat ramps and cleaning tables observing how many fish were being cleaned and obtain fish counts in this manner. High School students could be encouraged to participate as it would be a learning experience for them as well, may be the high schools could incorporate this process into their curriculum and turn it into a science/research project.

There was a recommendation to classify Dolphin and Wahoo as Highly Migratory Species so that the counts would be mandatory. This effort would be costly to the regular fisherman/fisherwoman as it would add additional cost to the overall trip. I believe paying for boat maintenance, gas, ice, food, bait, and tackle is enough cost to burden the common recreational angler and this idea should not be put back on the table for discussion.

From: David Neblett david@perryneblett.com
Sent: Wednesday, January 27, 2021 7:29 PM
To: SAFMC Administrator administrator@safmc.net
Subject: Comment on the Public Hearing

To Whom it May Concern,

I attended the public hearing tonight. Thank you for having same.

I am an avid fisherman and an admiralty attorney. My home port is Miami Florida, I have two boats and fish as much as possible.

I could not figure out how to “raise my hand”, but I do have some comments.

I believe that size limits and uniformity are very important for the fishery and are also “fair.” I suggest that the Florida State limits are implemented all along the east coast. I see many posts and photos of boats/docks in the Carolinas that show me that the anglers and charter captains there are just killing as many fish as they can regardless of the size of the fish and regardless of what is reasonable for those anglers to eat. I believe that you should limit the bag limits and also implement minimum size limits. I think that this will help the entire fishery and anglers like me will stop wondering why we are limiting our catch so that all the boats further north can catch the fish.

I am a huge proponent of only keeping what you can eat and tagging and releasing fish. If you have limits, then you can promote catch and release fishing in addition to protecting the fishery. 10 dolphin per person and 1 wahoo per person is plenty. Many for hire charter captains and communities do just fine with limits and many more have adapted to catch and release fisheries – like billfish – and continue to thrive.

Thank you for your work and for considering the above.

David Avellar Neblett, Esq., B.C.S.* | *Partner*

From: Cameron Guthrie marlinfever80@yahoo.com
Date: January 27, 2021 at 7:43:36 PM CST
To: annabarriosbeckwith@gmail.com
Subject: Dolphin wahoo limit

Mrs. Beckwith,

As a charter fisherman in Morehead City, I am truly concerned with the proposed bag limit reduction of dolphin and wahoo. This would kill our business, especially in the fall. Please pass on my concern to other board members. I have also emailed chairman Bell.

Thank you,
Capt. Cameron Guthrie
Marlin Fever Sportfishing