



South Atlantic Fish Management Council

4055 Faber Pl Dr #201
North Charleston, SC 29405

May 26, 2021

Mel Bell,

The North Carolina Watermen United is submitting these comments regarding the Dolphin/Wahoo Fishery.

The Dolphin Annual Biological Catch (ABC) increased from a little over 18 million pounds to approximately 24.5 million pounds based on the statistics that have been recalculated with the new Southeast Fisheries Science Center weight estimation procedure and updated estimates of recreational catch from the revised Marine Recreational Information Survey. In March, additional information was presented to the Council that noted that the current preferred alternative which sets ABC = ACL indicated a 47 percent buffer between average landings and what would be the new ACL for dolphin.

While the charter industry serves the recreational fishing public, it is essentially a commercial operation with unique needs. The charter industry is a major economic driver for our coastal communities and should be offered similar considerations to the commercial sector by the Council. Typically, when the commercial sector requests a trip limit to better serve their needs, they are granted those considerations as long as no overage is projected in the Annual Catch Limit (ACL). As an example, commercial king mackerel are managed under a regulatory framework with unique and specific seasons and/or trip limits that vary across the region to ensure efficient prosecution of the fishery. Some of these split seasons and trip limits even vary across regions and time frames as small as a few counties wide and last as long as a few months or less. Split seasons for Snapper/Grouper species and regional management of Spanish Mackerel are just a few additional examples of the Council's consideration of the commercial industries acute needs.

To assume that the charter industry is not due similar consideration of regional needs is inequitable. The needs of the charter industry are different than those of the private angler and those needs should be acknowledged by the Council. Bluefish, cobia, and blueline tilefish are examples of these types of consideration that have been executed successfully. These three species all have different trip limits for charter operations when compared to private recreational limits to ensure that for hire trips are profitable and can attract paying customers.

National standard 2 for fishery conservation and management codified in the Magnuson-Stevens Fishery Conservation and Management Act states “*Conservation and management measures shall be based upon the best scientific information available*”(a). The new dolphin ABC and ACL preferred by the council is not expected to be achieved in years of average catch. If the council has concerns with the status of the population, they should ask the Science and Statistical Committee of the council to reconsider its ABC recommendation for the dolphin stock citing these regional concerns of low population size and small individuals. Alternatively, the Council could consider setting a buffer between the ABC and ACL to account for any uncertainty that the Council may have in the dolphin stock and provide a more risk adverse posture for the management of the species. This would be a fair strategy that affects everyone in the region similarly.

The Council also appears to consider the new ABC “best scientific information available” and has enough confidence in the ABC to set it equal to the ACL. The current preferred ACL is not projected to be met in years of average catch, therefore unnecessarily forcing a reduction in the vessel limit of dolphin on the charter fleet in North Carolina resulting in a detrimental economic impact on one subsector in one region greater than any perceived precautionary benefit it may achieve is unequitable and arbitrary. This action is unsupported based on the available science cited above. If a vessel reduction is viewed as necessary to be precautionary then it should be implemented in the private recreational sector alone and allow the charter industry to remain at status quo. By doing this it would better allow us to abide by National Standard 1; “*Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.*”(b) We are confident that since we are not projected to achieve the ACL in years of average catch that our 60 fish vessel limit prevents overfishing while allowing us to achieve optimum yield.

(a). §600.315 National Standard 2 – Scientific Information

(b). §600.310 National Standard 1 – Optimum Yield

The North Carolina charter fleet was the original group to self-impose the 60 fish vessel limit. This was adopted into rule in North Carolina (c) and eventually mirrored by the council in the first Dolphin and Wahoo Fishery Management Plan. It should be noted that while the commercial industry serves the non-fishing public with sustainably caught fresh local seafood, the charter industry serves the non-boat owning public to the same end. Often local and visiting clients will fish one or two days a year and use that opportunity to harvest seafood for their families. North Carolina’s charter industry feels that a 60 vessel limit is appropriate to provide this service to our clients. Our vessels must travel great distances from shore and have a limited season that is greatly impacted by weather. The dolphinfish is the most important species for North Carolina’s charter fleet exemplified by the fact that dolphin ranks consistently in the top five most landed finfish by pounds for recreational anglers in North Carolina

(d). National Standard 5 states “*Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.*”(e) We feel that a reduction in the vessel limit for our fleet in our region would go against the standard.

Appropriate accountability measures as well as the new mandatory reporting for the charter fleet assures that a sustainable harvest will occur. It is unnecessary to take actions that will solely harm the viability of the charter fleet in NC when reasonable alternatives are available. We feel that there are

additional alternatives that the Council could select (Buffer between ACL/ABC; accountability measures; regional consideration of vessel limits; or reduction of bag/vessel limit on private angler only) with lesser impacts on our fishing community.

National Standard 8 states *“Conservation and management measures shall, consistent with the conservation requirements of the Magnuson-Stevens Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that are based upon the best scientific information available in order to: (1) Provide for the sustained participation of such communities; and (2) To the extent practicable, minimize adverse economic impacts on such communities.” (f)*

As the NC charter industry begins its recovery from COVID 19 we implore that the Council “minimize adverse economic impacts” on our communities. We believe that a reduction in the vessel limit of the private angling community will achieve the councils desire to be precautionary without undue damage to the charter fleet and not compromise the achievement of conservation requirements and goals of the FMP.

Dolphin is the most important species to our charter fishing community. We feel that the current preferred alternative of lowering the vessel limit to 48 fish negatively affects the sustained participation of our charter fishing community. Allowing the charter fleet to remain *status quo* on the dolphin vessel limit would provide the greater potential for sustained participation of our charter community and minimizes the adverse economic impacts while achieving similar conservation goals (precautionary management).

(c) North Carolina Marine Fisheries Commission Rule 15A NCAC 03M .0515 Dolphin; see history note - date of earliest effective date July 1, 1999

(d) 2019 North Carolina Landings and Harvest Trends

(e) §600.330 National Standard 5 – Efficiency

(f) §600.345 National Standard 8 - Communities

You will be receiving a follow-up email with 135 signatures in support of the current 60 fish vessel limit.

Thank you for your attention to this matter.

Yours truly,

Perry Wood Beasley

Perry Wood Beasley
President, NCWU
252-706-0184

PWB: wj

cc: Anna Beckwith

Board of Directors

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



26
 25

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIE NT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
MIKE SCAMPSON	<i>[Signature]</i>	ALS GAL MATE		
BILL MAXWELL	<i>[Signature]</i>	TAMA FEVER CAPT		252-599-1097
GREGG MCHALE	<i>[Signature]</i>	Game Changer		804 252 4084
DAVID SWAIN	<i>[Signature]</i>	Captain "High Return"		252-216-8881
AARON WRIGHT	<i>[Signature]</i>	Captain OUTFITTER		252-216-9121
Charles Gaddy	<i>[Signature]</i>	Captain Qualifier		252-423-1779
Barry Daniels	<i>[Signature]</i>	Captain SKIRT CHASER		252-216-8559
Gariett Palmatier	<i>[Signature]</i>	Mate Qualifier		252-216-1254
David C. Swain	<i>[Signature]</i>	Mate High Return		252-305-1481
CHRIS CORNELI	<i>[Signature]</i>	capt FIN PLANNER		252-216-7787
Dick HARRIS	<i>[Signature]</i>	JUSTICE CAPT		252-202-6301
Russ King	<i>[Signature]</i>	OWNER OIFC		252-441-6301
Jesse Granitzki	<i>[Signature]</i>	Captain		252-202-5423
Justina Sanderlin	<i>[Signature]</i>	OIFC employee		252 455 3854
Greg Mayer	<i>[Signature]</i>	Captain Owner		252 216 9054
Carcy Foster	<i>[Signature]</i>	1st Mate		252-207-4207

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIE NT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Edward Ashby		F/V SEABRUAN Capt		252-423-0528 1n76@WILDFIREcharters.com
Dean Johnson		F/V SEA ERA		252-305-7795 dean@seasera.com
Samie West		F/V Risky (3rd. 1025)		412-473-0396 Furk@bairns-55-jay@gmail.com
BILLOW HAINSWORTH		F/V FISHERY		252-305-0803 BILLOW.HAINSWORTH@GMAIL.COM
Alan West		F/V West Wind		252-423-1162 WestWindBoatsFishing.COM
Casi Robinson		F/V Fishin Frenzy		931-544-6302 robinsoncal@gmail.com
Garry Zilly		F/V West West		757-477-7113
Jennifer Kelly		local tree buyer		252-441-6301
Becky Smith		Family		252-455-3334
Ayra Wagner		Oregon Inlet Fishing Center reservations agent		(858) 441-6301 ext 1
Jasmine Ratcliff		Local Peace keeper		(612) 441-6301 ext 1
Maya Swiatkowski		Local Liberal		(888) 429-9114 ext 1
JAY WATSON		Captain Wildspeed		252-216-6203
Justin Hadden		MATE WIDESPREAD		484 261 4903
Pete Croger		Captain		252-573 9185

2021 3 DOLPHIN - WAHOO ISSUE
JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIENT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Alexander Carr				alex@tendersoninc.com
Corey Bradsher				cbadsher757@gmail.com
Corey Bradsher				cbadsher757@gmail.com
Judy Benks	Judy Benks	Release Family		cbadsher757@gmail.com
Elaine Whitaker	Elaine Whitaker	Release Family		cbadsher757@gmail.com
Mary Joyner		Release Family		Jayner.maryt@gmail.com
Ron Whitaker III	Ron Whitaker III	Release / Driver		Ron@whitakersrelease.com
Erica Thomas Trant				
Andy Trant				
Marghan Stallings				beachrx17@gmail.com
Darin Gibson	Darin Gibson	Bay Dream		d.melton.123@hotmail.com
Ron Whitaker Jr		Sound Bounce/owner		Ron@whitakersrelease.com
Alice Oden	Alice Oden			
Dan Oden	Dan Oden	Oden's Dock		odensdock@gmail.com
Laura Young	Laura Young	Native Son		youngs_research@yahoo.com

16/2021

2021 **4** DOLPHIN - WAHOO ISSUE
JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIENT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Judy W. Bonney		Brothers Pride		336-501-6459 jbonney25@gmail.com
Mr. Quate	Mr. Quate			
Thompson	Mr. Thompson	Owner Washi		
Collins Farmer	Collins Farmer			
Belsky Aiken	Belsky Aiken	Jerry's Surf Rod		
Daniel Hunt	Daniel Hunt	Runaway		252-489-3646
Jay Daniels	Jay Daniels	Runaway		204-562-7577
Spencer Sinyard	Spencer Sinyard	Business / note		
Rebecca Rhoten	Rebecca Rhoten	Jake Dempsey		bekrhoten@gmail.com
ASHLEY CONKLIN	ASHLEY CONKLIN	Jake Dempsey		aconkli2@gmail.com
Kerisa Kutz	Kerisa Kutz	Jake Dempsey		Kkutz0828@gmail.com
Dora Wilson	Dora Wilson	Jake Dempsey		701-034-2957
Shayla Mower	Shayla Mower	Jake Dempsey		336-501-6459 smowers1@gmail.com
Kerisa Molar	Kerisa Molar	Jm-Moran		336-210-2878
Patricia Molar	Patricia Molar	" "		336-501-6459
Will Johnson	Will Johnson			

16
REV 3

2021 **S** DOLPHIN - WAHOO ISSUE
JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIE NT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Richard DiMartino	<i>Richard DiMartino</i>	Sound Bound		757-406-7406
Joa Parant	<i>Joa Parant</i>	Family		252 202 8905
Kevin Manning	<i>Kevin Manning</i>	MATE		
Spawneane	<i>Spawneane</i>	unknown		804 486-5705
Walter Knight	<i>Walter Knight</i>	Sheep Boat		809 085 5726
JD ROTHGEB	<i>JD ROTHGEB</i>	SEA MEE		804 592 7508
John Atwood	<i>John Atwood</i>			804-592-7508
Tammy Taylor	<i>Tammy Taylor</i>			804-334-8120
John Dermanis	<i>John Dermanis</i>	UKNOWIT		757-489-0736
Shawn Shapiro	<i>Shawn Shapiro</i>	UKNOWIT		757-839-3874
JAMES ROUGHT	<i>JAMES ROUGHT</i>	UKNOWIT		757-289-5143
Shawn Sheple Jr	<i>Shawn Sheple Jr</i>	CHASIN TAIL		757-802-8486
Bryer Shapiro	<i>Bryer Shapiro</i>	SEA MEE		757-342-6229
Axle Emerson	<i>Axle Emerson</i>	Sound Bound		252 441 8583
Logan Williams	<i>Logan Williams</i>			
Angela Ballance	<i>Angela Ballance</i>			

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/ CLIENT	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Carol Turnet	<i>Carol Turnet</i>	Hatteras Harbor Marina Marine		252-305-6867
Licia Caldwell	<i>Licia Caldwell</i>	Hatteras Harbor Marina reservations		(252) 986-5261
MONA WATERS	<i>Mona Waters</i>	HATTERAS Harbor Marina reservations		252-219-9192
Dominic Maxine	<i>Dominic Maxine</i>	Hatteras Harbor Marina House keeper		252-256-0662
Mike Dickins	<i>Mike Dickins</i>	Hatteras Harbor Marina maintenace		252-305-7588
Sheila Ballance	<i>Sheila Ballance</i>	HATTERAS Harbor Marina RESERVATIONS		252-216-8018
STEVEN P. COUTER	<i>Steve Couter</i>	HATTERAS HARBOR Marina		252-996-0276
NEFF MATTHEWS	<i>Neff Matthews</i>	HATTERAS HARBOR		252-475-4051
Steve Gwin	<i>Steve Gwin</i>	Hatteras Harbor Capt		252-303-2569
Carey Shafter	<i>Carey Shafter</i>	Client		540-871-8600
Lisa Shafter	<i>Lisa Shafter</i>	Client		UPstoringir36@yahoo.com
CHARLIE Bandy	<i>Charlie Bandy</i>	Client		540 314 6181
Robert Bandy	<i>Robert Bandy</i>	Client		910 358 2928
BARRY PEELE, JR.	<i>Barry W. Peele Jr.</i>	CAPT.		252-473-8301
Dan Rooks	<i>Dan Rooks</i>	ALL OF THE ABOVE		252-216-6162
DANE MARSHALL	<i>Dane Marshall</i>	TOWERS BOAT		336.210.2870

2021 **7** DOLPHIN - WAHOO ISSUE
 JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

NAME	SIGNATURE	BOAT/POSITION: OWNER/CAPT/MATE/FAMILY/ CLIENT	PHONE OR EMAIL ADDRESS
STEVE GARRETT	<i>Steve Garrett</i>	Captain / <i>Hatteras Harbor</i>	252-475-0035
Sue Garrett	<i>Sue Garrett</i>	OWNER / <i>Fanny</i>	252-216-9665
HARRY BURROWS	<i>Harry Burrows</i>		757-675-3368
Bonnie Kocula	<i>Bonnie Kocula</i>	Gunner / Family / <i>Hatteras</i>	908-591-8078
Ron Whitaker	<i>Ron Whitaker</i>	Release / Owner	252-986-1031
Mike Warren	<i>Mike Warren</i>	HATTERAS BLUE OWNER / OPERATOR	252-475-0245
Ron Whitaker II	<i>Ron Whitaker II</i>	Sound Bound owner / operator	252-305-5229
John P. Cunningham III	<i>John P. Cunningham III</i>	Hookup - Owner/operator	252-216-8918
Tom Masterson	<i>Tom Masterson</i>	SOUND BOUND / CLIENT	215 234 0997
GARY AMEDDOLD	<i>Gary Ameddold</i>	" " "	216-598-0801
Wesley Jones	<i>Wesley Jones</i>	RELEASE / CLIENT	919-971-5251

2021 **9** DOLPHIN - WAHOO ISSUE
 JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

(11)

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIENT	BOAT/POSITION: NT	PHONE OR EMAIL ADDRESS
MICHAEL SEIZER		RELEASE - CLIENT		Catherine.Hermsdahl.com
Reana Putnam	Reana S. Putnam	release client		reana.putnam@jgh.com
Tonya Gray	Tonya Gray	Release - client		tlg1217@gmail.com
Scott Baker	Scott Baker	Release - Client		ScottBaker508@gmail.com
Julie Blunney		Release - Client		blunney.julie@yahoo.com
GABE BIBBEE		Release - client		K9bibbee@f1c@gmail.com
Sarah Blount		Release - First Mate		Sarah.C.Blount@gmail.com
Christopher Whiting		Release - client		chwhiting35@gmail.com
Tanner Peele	Tanner Peele	Release - Client		peeletan@gmail.com
Ross Scoble		Release - client		Ross.Scoble@gmail.com
John Kuffly		Security - Mate	Shuba-Mate	jkuffly3@gmail.com

2021 DOLPHIN - WAHOO ISSUE
 10 JUNE MEETING OF THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

NAME	SIGNATURE	OWNER/CAPT/MATE/FAMILY/CLIE	BOAT/POSITION:	PHONE OR EMAIL ADDRESS
Patrick Cato	<i>[Signature]</i>	OWNER/CAPT	Little倩 Owner/Captain	252 216 8430
Kenny Alden	<i>[Signature]</i>	Mate	Mad in Gull	252 216 8946
James Coulter	<i>[Signature]</i>	Owner	Carolina Girl	252-564-5283
UP Sifferly	<i>[Signature]</i>	Owner	Predator Sportfishing	803-673-7329
Chris Burnett	<i>[Signature]</i>	Owner	Predator	252 996 0269
Kenneth P. Scoville	<i>[Signature]</i>	Owner	MISS HATTERAS/owner	(252) 986-2365
Chris Nickerson	<i>[Signature]</i>	Owner	BoatTime	603-475 4436
Ernie Foster	<i>[Signature]</i>	Owner	Albatross Fleet	252-619-0135
Bill [unclear]	<i>[Signature]</i>	Owner	Cold Feet	910-520-2688
[unclear]	<i>[Signature]</i>	Owner	Raw Nips	8675309
[unclear]	<i>[Signature]</i>	Owner	[unclear]	252-995-3311
[unclear]	<i>[Signature]</i>	Owner	Chaser	757-870-1680

Council Members,
Comments on Wahoo:

While the NC charter fleet understands the need to be precautionary and support the 1pp wahoo bag limit for the private angling community it is imperative the Council understands our unique charter fleet needs. During public comment the charter fleet in NC spoke strongly for the need to retain a 2 pp limit on wahoo, in part as a result of our disparaging long, weather inhibited runs to the fishing grounds, but we were receptive to a reduced vessel limit if needed. A vessel limit of 12 would be ideal although a vessel limit of 10 could be managed. Our primary target species for fall trips is wahoo and our charters do not always have 6 people. We can better justify our prices if a charter of 2 or 3 clients is allowed to keep 2 pp up to a boat limit. This would allow us to continue to market our services, benefiting the local economy within our fishing communities.

The charter industry has unique needs different from the private angling sector. These include but are not limited too stable fishing seasons that allow our ability to plan ahead, prepare and market our fisheries. Bag/vessel limits need to be sufficient to satisfy customers so that they continue booking charters. The private boating public harvests the majority of the wahoo and we support the 1 pp bag limit to assure the quota is not exceeded. We also believe a 2pp bag with a reduced vessel limit for the charter fleet will achieve the desired precautionary approach but will allow us to continue to operate, especially during our very important, but weather dependent, fall fishery.

Comments on Dolphin:

The Dolphin Annual Biological Catch (ABC) increased from a little over 18 million pounds to approximately 24.5 million pounds based on the statistics that have been recalculated with the new Southeast Fisheries Science Center weight estimation procedure and updated estimates of recreational catch from the revised Marine Recreational Information Survey. In March additional information was presented to the Council that noted that the current preferred alternative which sets $ABC = ACL$ indicated a 47 percent buffer between average landings and what would be the new ACL for dolphin.

While the charter industry serves the recreational fishing public, it is essentially a commercial operation with unique needs. The charter industry is a major economic driver for our coastal communities and should be offered similar considerations to the commercial sector by the Council. Typically, when the commercial sector requests a trip limit to better serve their needs, they are granted those considerations as long as no overage is projected in the Annual Catch Limit (ACL).

As an example, commercial king mackerel are managed under a regulatory framework with unique and specific seasons and/or trip limits that vary across the region to ensure efficient prosecution of the fishery. Some of these split seasons and trip limits even vary across regions and time frames as small as a few counties wide and last as long as a few months or less. Split seasons for Snapper/Grouper species and regional management of Spanish Mackerel are just a

few additional examples of the Council's consideration of the commercial industries acute needs.

To assume that the charter industry is not due similar consideration of regional needs is unequitable. The needs of the charter industry are different than those of the private angler and those needs should be acknowledged by the Council. Bluefish, cobia, and blueline tilefish are examples of these types of consideration that have been executed successfully. These three species all have different trip limits for charter operations when compared to private recreational limits to ensure that for hire trips are profitable and can attract paying customers. National standard 2 for fishery conservation and management codified in the Magnuson-Stevens Fishery Conservation and Management Act states "Conservation and management measures shall be based upon the best scientific information available" a The new dolphin ABC and ACL preferred by the council is not expected to be achieved in years of average catch. If the council has concerns with the status of the population, they should ask the Science and Statistical Committee of the council to reconsider its ABC recommendation for the dolphin stock citing these regional concerns of low population size and small individuals. Alternatively, the Council could consider setting a buffer between the ABC and ACL to account for any uncertainty that the Council may have in the dolphin stock and provide a more risk averse posture for the management of the species. This would be a fair strategy that affects everyone in the region similarly.

The Council also appears to consider the new ABC "best scientific information available" and has enough confidence in the ABC to set it equal to the ACL. The current preferred ACL is not projected to be met in years of average catch, therefore unnecessarily forcing a reduction in the vessel limit of dolphin on the charter fleet in North Carolina resulting in a detrimental economic impact on one sub sector in one region greater than any perceived precautionary benefit it may achieve is unequitable and arbitrary. This action is unsupported based on the available science cited above.

If a vessel reduction is viewed as necessary to be precautionary then it should be implemented in the private recreational sector alone and allow the charter industry to remain at status quo. By doing this it would better allow us to abide by National Standard 1; "Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry." b We are confident that since we are not projected to achieve the ACL in years of average catch that our 60 fish vessel limit prevents overfishing while allowing us to achieve optimum yield.

a. §600.315 National Standard 2—Scientific Information

b. §600.310 National Standard 1—Optimum Yield

The North Carolina charter fleet was the original group to self-impose the 60 fish vessel limit. This was adopted into rule in North Carolinac and eventually mirrored by the council in the first Dolphin and Wahoo Fishery Management Plan. It should be noted that while the commercial industry serves the non-fishing public with sustainably caught fresh local seafood, the charter industry serves the non-boat owning public to the same end. Often local and visiting clients will fish one or two days a year and use that opportunity to harvest seafood for their families. North Carolina's charter industry feels that a 60-vessel limit is appropriate to provide this service to our clients. Our vessels must travel great distances from shore and have a limited season that is

greatly impacted by weather. The dolphinfish is the most important species for North Carolina's charter fleet exemplified by the fact that dolphin ranks consistently in the top five most landed finfish by pounds for recreational anglers in North Carolina.d

National Standard 5 states "Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose." e We feel that a reduction in the vessel limit for our fleet in our region would go against this standard.

Appropriate accountability measures as well as the new mandatory reporting for the charter fleet assures that a sustainable harvest will occur. It is unnecessary to take actions that will solely harm the viability of the charter fleet in NC when reasonable alternatives are available.

We feel that there are additional alternatives that the Council could select (Buffer between ACL/ABC; accountability measures; regional consideration of vessel limits; or reduction of bag/vessel limit on private angler only) with lesser impacts on our fishing community.

National standard 8 states "Conservation and management measures shall, consistent with the conservation requirements of the Magnuson-Stevens Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that are based upon the best scientific information available in order to: (1) Provide for the sustained participation of such communities; and (2) To the extent practicable, minimize adverse economic impacts on such communities." f

As the NC charter industry begins its recovery from COVID 19 we implore that the Council "minimize adverse economic impacts" on our communities. We believe that a reduction in the vessel limit of the private angling community will achieve the councils desire to be precautionary without undue damage to the charter fleet and not compromise the achievement of conservation requirements and goals of the FMP.

Dolphin is the most important species to our charter fishing community. We feel that the current preferred alternative of lowering the vessel limit to 48 fish negatively affects the sustained participation of our charter fishing community.

Allowing the charter fleet to remain status quo on the dolphin vessel limit would provide the greater potential for sustained participation of our charter community and minimizes the adverse economic impacts while achieving similar conservation goals (precautionary management).

c. North Carolina Marine Fisheries Commission Rule 15A NCAC 03M .0515 DOLPHIN; see history note – date of earliest effective date July 1, 1999

d. 2019 North Carolina Landings and Harvest Trends




e. §600.330 National Standard 5—Efficiency






f. §600.345 National Standard 8—Communities

Council members, please remember your decisions have a big impact on families and their livelihood. We ask you to take careful consideration on the effects your decision on Amendment 10 will have on the NC For-Hire industry.



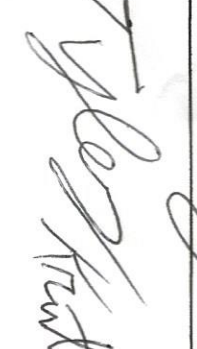
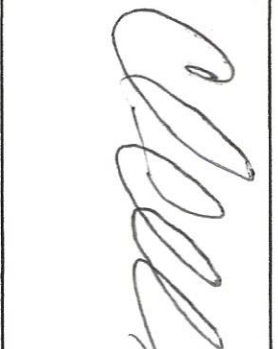

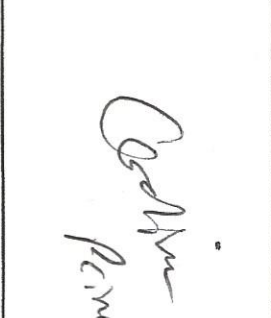
Thank you,







The Carteret County NC Charter Fleet






Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.)	Phone number or Email Address
Capt. Stephen Draughon		Draughon Ent Captain bill collector offshore	252-725-1055
Hunter Draughon		Mate Bill Collector Charters	252-725-1850
Tina Draughon		Secretary Bill Collector Members	252-725-0829

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.))	Phone number or Email Address
KEN RAMER		SOMMERS OWNER	252 342 8163
Wayne Dossin		Carolyn Princes, Capt.	252-269-6947
Patrick Dufour		Mary Maria	914-548-1147
Camen Guthrie		Marlin Fever	252-725-0544
Wayne Dossin		Carolyn Princes	Admin@CarolynPrinces.com 952-7265472

Morgan & Allen
 Allen & Allen

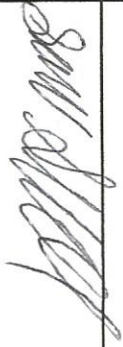

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.)	Phone number or Email Address
Letha Price			
WADE Fickling		Charter boat Capt The General	info@thegeneralspanfishing.com 252-342-0508
Tyler Krutol		Mate sensation	252-269-1013
Chris Allen		Owner OUTTA HERE	252-503-2686
Sara Dobson		 Perrines	admin@cedlingperrines.com

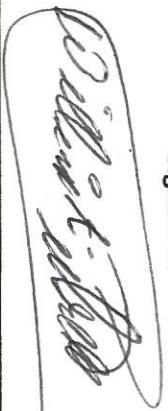





Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.)	Phone number or Email Address
Letha Price			
WADE Fickling	Wade 	Charter boat Capt The General	info@thegeneralspanfishing.com 252-342-0508
Tyler Krutol		Mate sensation	252-269-1013
Chris Allen		Owner OUTTA HERE	252-503-2686
Sara Dobson		 Permes	admin@cedlingpermes.com

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.))	Phone number or Email Address
TYLER BEBOUT			
Bryton Templin			
Wes Schwabe			
Sawyer Brown			
ADAM PRICE			

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/Mate/ Family/ Client. Etc.))	Phone number or Email Address
Mark Chambers Mark Chambers	Mark Chambers	Charter boat capt.	252-342-0097
WADE Fickling	WADE F	Charter boat Capt	252-342-0508
THOMAS Wood	THOMAS WOOD	ex-Charterboat Capt PRIVATE BOAT CAPT	252-241-8346
Alan Wilks	Alan Wilks	EX Charter capt Contract Private boat Capt	252-723 5779
Trey Sadler	Trey Sadler	Charterboat Mate	252-945-7173
Alan Scibal	Alan Scibal	Captain	252-725-9604
Randy Runyan Nathan Newlin	Randy Runyan Nathan Newlin	Charter Mate Charter capt ex charter mate	910-340-7968 919-819-2118

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.)	Phone number or Email Address
Malcolm Waters	Malcolm Waters	The Buyout Owner	252 659 0571 Malcolm W @ waterscontracting.net
Kristi Waters	Kristi Waters	The Buyout Owner	252 342 5209 Malcolm W @ Kristi W @ waterscontracting.net
Jackson Rogers	Jackson Rogers	The Buyout Mate	252-725-3972
BROCK TATALOVICH	Brock Tatalovich	THE BUYOUT	(214)-307-0811
Ronald Sanders	Ronald S.	The Buyout	252-725-2738

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.)	Phone number or Email Address
Sam Stainback		Bill Collector etc	(252) 922-4563 SamStainback@HawaiiKa
Thomas Sands	Tom Sand	Bill collector Client	336-408-0626 Twsandskpl@yahoo.com
JEFF LEMONS	Jeff Lemons	Bill collector	336-407-0079
Robb Gray	Robb Gray	Bill collector	336-326-7346
RONNIE McADAMS		Bill collector	919 732 8785

Name	Signature	Affiliation (Charter Boat and Position (Ex: Owner/Captain/ Mate/ Family/ Client. Etc.))	Phone number or Email Address
William Corbett			251.630.8839
Don Lindsay			336 339 7142
Gary Corbett			252-665-1501
MITCHELL R. CUTRELL			(434) 848-2529
Greg Lindsay			910 622 5835
Donald Johnson			336-345-3110