



# National Association of Charterboat Operators

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Virginia Charter Boat Assn.  
Westport Charterboat Association

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Sent via email [Contractor1@fish2020.org](mailto:Contractor1@fish2020.org)

To Whom It May Concern:

The National Association of Charterboat Operators (NACO) appreciates the opportunity to submit comments regarding the MAFAC recommendations on future policies. By way of background, NACO is the nation's largest charter boat association, representing over 3,400 charter boats nationwide.

We have separated our comments into your proposed general recommendation sections.

## Commercial fisheries

1. No comment
2. Agree
3. LAPS are not necessarily the proper management tool as in many cases they do little to enhance the resource because they do nothing to reduce discard mortality and in some cases, such as red snapper, actually increase discard mortality due to the multi species reef fish fishery where fishermen who target species other than red snapper continue to discard red snapper. Rather than creating a LAP for a fishery and then modifying the plan to adapt, the plan should be fully researched and designed with all issues such as discard mortality fully accounted for. In many cases the result will be that the LAP cannot work for the resource and only controls fishermen. Recreational fisheries will be extremely difficult if not impossible to manage with LAPS as allocation of quota and discard mortality will be difficult to address. Most recreational anglers target more than 1 species so any attempt to manage in a single species mode will be next to impossible and work to increase discard mortality in other species. Allocation of species to individual anglers or communities will be extremely difficult and will expand the current problem of driving people away from recreational fishing. Privatization of public resources is the wrong approach for the resource.
4. Any effort to promote aquaculture is wrong until proven methods of protecting wild stocks from genetic altering, disease, environmental disasters, restricted fishing areas, etc are developed. Aquaculture developers need to be financially responsible for any possible damage to the natural resource prior to approval of a national act.
5. Agree

## Recreational

1. Strongly agree and this should be enhanced by expanded economic and social studies, which include real anglers, both private recreational and recreational for-hire. Study design should include advice from stakeholders on all levels of social and economic activity.

2. Already being done.
3. Strongly agree and suggest the language include social and economic impacts (past, present, future).
4. Conservation should be encouraged and status quo allocations should be maintained regardless if the recreational sector does not harvest their allotted share. Regulations that include a conservation component should be monitored to ensure the conservation provisions are realized and where they are not the conservation provisions should be removed.
5. In some cases the recreational fishing experience can rival or exceed the catch but the recreational experience should never be based on experience alone. Some fish species are prime candidates for catch and release while others are not. The recreational fishing experience includes all types, the experience of fishing, catch and release, and harvest.

### **Management**

1. Agree and suggest efforts to ensure such carried out.
2. Agree with reservations, extensive stakeholder involvement that includes anecdotal information in the design of eco-system based models should be utilized.
3. Add constant communication between all as a necessity for cooperative management.
4. Accurate needs to be placed before "catch data" and extensive stakeholder involvement should be incorporated in the management decisions.
5. Same applies as #4
6. Other agencies responsible for food safety should be included here.
7. This should also include safety as a result of health resources as there may be circumstances where reduced harvest to ensure resource health may be more beneficial than allowed harvest.
8. Agree
9. Strongly agree and suggest this message be passed along to the state department of and other cabinet level departments.

### **Aquaculture**

1. Prior to support of any national act there should be assurances that wild species will remain free of any harm as a result of genetic altering, enhanced food and the use of other fish species to be used for food should be monitored to assure no harm to the resource. All open water aquaculture activities should only be allowed if assurances are made that consider all possible natural disaster impacts. All aquaculture activities should have every possible negative impact identified and plans to counter any negative impact fully outlined with a plan to prevent such impacts prior to

approval. All aquaculture proposed businesses should be responsible for providing bonds to cover any and all possible damage to wild stock and associated users of the resource.

2. This section should also include potential disaster coverage, which assures that the domestic fishermen and communities are compensated for any loss or harm of wild stock.
3. Add "and effective" after "efficient".

Thank you for the opportunity to share our comments.

Best Regards,

*Robert F. Zales, II*

Robert F. Zales, II  
President

BMW/sim