

N.C. Marine Fisheries Commission
November 2025 Quarterly Business Meeting
Written Public Comment

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| Bryan Brinkley | North Carolina | How about for once we think about the recreational fisherman. The people that spend the most money and have the most votes but continually lose the ability to keep fish. Yet, commercial fisherman get continued support while shipping off the majority of NC fish to other states. |
| Richard Hoppe | North Carolina | I do not support mandatory reporting |
| Larry E. Allen Jr. | North Carolina | It's time to ease the catch limits on flounder and Redfish for recreational fishing. Recreational fishermen (RF) actually have very few days that they are on the water. Not so with commercial fishermen. RF have very few opportunities to take home enough fish to even feed their family for one meal much less a few meals. The amount of money RF spend to catch such a small amount of fish is ridiculous. And using the online reporting system is just a waste of time and resources. Do like the duck hunters and send out a report card after the season. You are killing the sport and future of recreational fishing. |
| Jerry Brown | North Carolina | Recreational fishing reporting should not be mandatory unless a recreational fisherman exceeds a reporting limit requirement. |
| Jerry Brown | North Carolina | Recreational fishing reporting should not be mandatory unless a recreational fisherman exceeds a reporting limit requirement. |
| Jerry James | North Carolina | Give us our flounder and stripers back and qitt lying about ther abundance. More out there now than I have ever seen. You have a hard time keeping the ones we can keep because of so many flounder and stripers |
| David P Thomas | North Carolina | In light of the tremendous success with the slot approach to red drum, it may be worthwhile trying this with flounder. It is my understanding that the biggest flounder are female, hence they have the |

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| | | largest clutches of eggs, and should be allowed to spawn. This might help maintain the health of the flounder fishery. |
| Vincent Becton | North Carolina | Very pleased to see new regulations requiring both Commercial and Recreational fishermen to report all catch data. Only way to collect real fisheries data. I do feel this will also require more Marine Patrol officers to ensure the laws are followed. Fishing perries, boat ramps, ferry docks, as well as fish camps should be locations to patrol daily. |
| Sean Mulligan | North Carolina | NC has the most restrictive recreational fishing regulations. NC is also the only State that allows inshore shrimp trawling. For every pound of shrimp there are at least 4 lbs. of bycatch. Bycatch equals juvenile fish. I have seen it first hand. There is recently a very good shrimp haul in the Atlantic off the NC coast these days. If the fishing stocks are too low it is the result of the shrimp trawling not recreational fisherman. Also not allowing mullet harvest which is a favorite bait of recreational fisherman on Friday, Saturday and Sunday is just wrong. There is no way I am going to report my catch that is ludicrous. I think a good CLASS ACTION LAWSUIT against NCDMF and the State of NC would be appropriate as that is the only chance for meaningful change. |
| Kevin Ferguson | North Carolina | Blue Crab Fisher Reg 3 Ban harvest of actively reproducing female crabs(sponge crab,) not just dark sponge. And do this all year. |
| Cary Glover | North Carolina | I would like to address this letter to the Division of Marine Fisheries in Morehead City NC. I am Cary Glover 73 yrs old and have fished the coast of N.C. since I was 12 yrs. old. I love all kinds of fishing but the fishing I love most has always been flounder gigging my whole life. When I first started there were no limitations of any kind, size or how many. By the time I got into my 20's they put a 13 in. size limit on flounder, which was good because people were gigging too many small flounder. You could gig other fish such as Red Drums, Trout, SheepHead among others. As time went on flounder went to 14in. and you won't allowed to gig red fish, which I never understood why? I could and still can fill my boat with red drum. It was a stupid regulation and still is. Eventually they imposed a limit on flounder 24 per person which I did not see that as a problem. Then flounder went to 15in with a 18 |

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| | | <p>limit. Then in the not so far future they went to 12 , 8 , then 4 per person which was year round. I could deal with that, but knew it was stupid because I could still find just as many flounder as I ever could. Then they come up with a brain child of one flounder per person for two weeks. Just happened to be a hurricane at the time passing our coast and no one could get on the water . Have you ever factored into the equation that gas cost more than one flounder? Then you open it up for commercial fishing for almost two weeks while we watched another hurricane follow the first one. No one could safely get on the water nor could anyone have seen anything in the water because of the conditions. So I'm making this short and I even doubt this will be read but I'm at the end of my life and even if regulations were like they use to be when they made sense I probably won't be able to go floundering much longer because of my age. Your regulations are totally out of line. You show me a person that says they know how many fish are in the ocean and I will show you a damn liar. Global warming is a lie, because it's all natural. I'm sure no one if reading this cares about how I feel but if fishing regulations don't get better I promise I will spend the rest of my life seeking Legal action against the Division of Marine Fishery in North Carolina. I personally know close to a hundred that feels the same as I do. I thought God owned the ocean and I'm betting my life that he still does.</p> |
| WILLAM GORHAM | North Carolina | <ul style="list-style-type: none"> - Support increasing minimum size to the length determined to be equal to 75% maturity. - Bag limit to 8 fish per day, no captain and mate bag limit. <p>The only rationale for these changes is sampling continues to show low samples of older fish. So the action is not proactive as much as its we should probably do something.</p> <p>I do not believe these or any restrictive regulations will have much if any measurable benefit to building the age structure, at least on paper.</p> <p>Ask, the division to issue a white paper on alternate hypothesis or theories as to why are we seeing younger age groups in the sampling for multiple species? Are older fish staying further off shore outside of sampling locations?</p> |

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| | | Regulation changes should be based on a clear purpose & need, and should ultimately be measurable for its effectiveness or lack thereof. Restricting one fishery because effort shifted due to other greatly restricted or closed fisheries is not sustainable management, at least not for the businesses built on saltwater fishing. |
| thomas womble | North Carolina | <p>The recreational flounder fishing regulations are way out of touch with reality. I have fished for flounder for 50+ years. The past few years I have caught as many legal size flounder as I have in many years. Typically fishing for drum or trout and catching flounder from May - November. The hook and line recreational rules need to be eased to allow the average fisherman and tourist to catch and keep flounder for more than 2 weeks out of the year. My recommendation would be 3 fish daily limit, 15+ inches, with a season May 1-October 31.</p> <p>Thomas Womble, lifetime sportsman license holder and NC resident for 64+ years.</p> |
| ralph lewark | North Carolina | I am against any new regulations concerning the blue crab fisheries. I live in the currituck sound region and made a living all my life in the crab fisheries until i got to old. There is no shortage of crabs in our area thank you Ralph Lewark |
| Chris McCaffity | North Carolina | Please make fishing fun again by focusing more on enhancement than enforcement. Please ask the NC Legislature to remove hard rebuilding deadlines for flounder and shift dead discard quota allocations to harvestable quota with reasonable retention limits that keep seasons open most of the year. Please consider options for using regional hatcheries to incubate fertilized eggs from a variety of local specimens and release hatchlings by the billions as Natural Selection ensures survival of the fittest. Public Water aquaculture should be limited to stocking native seafood that can naturally reproduce. Please support labeling genetically altered species raised in cages as such, so consumers know what we are eating. Please support a moratorium on any new Public Water leases that restrict access to our waters and the Public Resources they hold. Please stop passing any more laws restricting our freedom to fish and eat local wild-caught seafood as we |

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| | | review regulations already in place to see what is working well and what isn't, so adjustments can be made as necessary to limit waste and sustainably make fishing fun again for everyone. |
| Marc Mitchum | North Carolina | <p>With 30 plus years of crabbing I have seen lean years and good years, with the last two being very good. There has also been a large reduction in the number of crabbers, I believe caused by the high cost of young people getting started, along with the fact that crabs can be hard to catch, and crabbing is physically hard work. With that said, if trip tickets are the source of data the NCDMF uses to determine crab stocks then of course numbers are lower. As for regulations on crabs, the taking of egg bearing females needs to stop, this is a regulation that would make since and not hurt most crabbers. Crabs are cheap in the fall, and a 10 bushel limit on females would not be economically feasible. To take away females in the spring when crabs are high in price would take a huge amount of income. We that go hard have large investments in our boats and gear, as with any other business</p> <p>This proposal is ridiculous, and would put crabbers out of business. Even though we are small in number, most of us are simply trying to make a living and support our families. It would seem that NCDMF does not see the human equation, always taking away, and never giving back. We stimulate the economy by constantly spending money on gear, we pay taxes, and are involved in our communities. And yet, our livelihoods are constantly threatened as fisheries are taken from us. We know that the CCA and probably corporations that import seafood are behind much of what goes on. I hope that NCDMF will do that right thing and let us be allowed to make a living.</p> <p>Thank you for your time, Marc Mitchum</p> |
| THOMAS COLTRAIN | North Carolina | <p>This will fall on Deaf Ears like all the other comments in person and online that I have made. Letting nets be set above the ferry lines will destroy the striped bass that have made in the last few years with no nets above the ferry lines. They will get caught in the nets and die and get thrown back, total waste. I think this was a plan and YOU will let the Netters keep them as by-catch and open the season for recreational in April when they are up river and dead from nets. You have managed to DESTROY recreational fishing in NC for a DOLLAR. You only make rules and limits that benefits the Commercial fishermen. The new reporting system is a Total joke just like trip tickets. There are so many fish caught and sold with no reported income that it is a joke. Keep up the way you are going</p> |

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| | | <p>and it want be many years you will have totally shutdown fishing for very one, just look at your track record. I don't know why you can not look what other states have done to restore fishing all around NC. You know what do do but want do because of a dollar. I will say it again and again get the nets and inshore otter trawling for shrimp out of NC and all the fish and crabs will recover.</p> |
| North Carolina Coastal Counties Fisheries Coalition | North Carolina | <p>Resolution of the North Carolina Coastal Counties Fisheries Coalition Opposing Proposed Restrictions on the Blue Crab Fishery</p> <p>WHEREAS, the blue crab (<i>Callinectes sapidus</i>) fishery is one of North Carolina's most valuable and culturally significant coastal resources, contributing millions of dollars annually to the state's economy and supporting hundreds of commercial fishing operations, seafood processors, distributors, and working watermen across our coastal counties; and</p> <p>WHEREAS, the blue crab fishery sustains the livelihoods of generations of commercial fishermen and seafood businesses, while preserving the maritime heritage and economic stability of coastal communities; and</p> <p>WHEREAS, the Albemarle and Pamlico Sounds and their connected waterways represent some of the most productive blue crab habitats in the state and the USA, and that a significant portion of North Carolina's total blue crab harvest originates from these waters; and</p> <p>WHEREAS, since the adoption of the Blue Crab Fishery Management Plan in 1998, three amendments and two revisions have been made, and a comprehensive external review of the plan was conducted in 2023; and</p> <p>WHEREAS, the most recent accepted blue crab biomass stock assessment was completed in 2018, and the North Carolina Division of Marine Fisheries (NCDMF) has advised that a new stock assessment is currently underway and expected in 2026; and</p> <p>WHEREAS, an updated stock assessment was conducted, found not to meet scientifically standards by scientific experts and the experts recommended a new benchmark assessment be completed before any additional regulatory changes were enacted; and</p> <p>WHEREAS, the NCDMF does not know the population status of blue crabs; and</p> <p>WHEREAS, recent scientifically published paper by Voigt et al., Long-Term Trends in Juvenile Blue Crab Recruitment Patterns in a Wind-Driven System, found that that there is no evidence that</p> |

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| | | <p>recruitment overfishing of blue crabs is occurring in NC, unlike what the DMF suspected and stated in Blue Crab FMP Amendment; and</p> <p>WHEREAS, the blue crab fishery is complex and influenced by a variety of environmental and economic factors-such as weather, water quality, salinity, currents, tides, hypoxia, and market conditions-none of which are fully captured in current NCDMF trawl-and gill net based data collection methods; and</p> <p>WHEREAS, many commercial crabbers have invited NCDMF biologists to observe pot fisheries firsthand in order to improve scientific understanding, but these offers have not been meaningfully incorporated into management decisions and the NCDMF terminated its fisheries dependent blue crab sampling programs; and WHEREAS, the Division of Marine Fisheries has proposed new harvest restrictions, including hard crab landing limits of 30 bushels north of Highway 58 and 15 bushels south of Highway 58 from September through December, as well as a statewide prohibition on crab trawling; and</p> <p>WHEREAS, these proposed measures would result in significant decreases in landings compared to 2019-2023 averages, leading to substantial economic losses for watermen, seafood processors, and the broader coastal economy; and</p> <p>WHEREAS, the North Carolina Sea Grant has reported that the state's wild and farmed shellfish industries contributed approximately \$31. 7 million to the state economy in 2022, demonstrating the importance of maintaining a balanced and sustainable approach to fisheries management; and</p> <p>WHEREAS, recent data indicate that blue crab landings remain stable in recent years and that fishing effort has declined and all of the NCDMF advisory committees have recommended maintaining the current ("status quo") management measures until the completion of the 2026 assessment; and</p> <p>WHEREAS, premature or overly restrictive regulations risk inflicting unnecessary economic harm on commercial crabbers, seafood businesses, and coastal communities without sufficient scientific justification.</p> <p>NOW, THEREFORE, BE IT RESOLVED by the North Carolina Coastal Counties Fisheries Coalition, that:</p> <ol style="list-style-type: none"> 1. The Coalition formally opposes the adoption of any new blue crab harvest restrictions prior to the |

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| | | <p>completion of the 2026 Blue Crab Stock Assessment.</p> <p>2. The Coalition urges the North Carolina Marine Fisheries Commission and the Division of Marine Fisheries to base all future regulatory actions on transparent, peer-reviewed science and to include comprehensive economic impact assessments and full stakeholder consultation.</p> <p>3. The Coalition calls on state officials to adopt a more inclusive and field-informed data collection process that reflects real-world fishing conditions, including direct observation opportunities with working watermen.</p> <p>4. The Coalition supports balanced management solutions that ensure the long-term sustainability of the blue crab population while protecting the economic and cultural heritage of North Carolina's coastal communities.</p> <p>5. The Coalition stands ready to collaborate with state agencies, research institutions, and stakeholders to develop data-driven, equitable and sustainable fisheries management strategies.</p> |
| Dare County Board of Commissioners | North Carolina | <p>Resolution in Opposition of Proposed Blue Crab Harvest Restrictions</p> <p>WHEREAS, in December 1998, a fishery management plan for blue crab was adopted and, since that time, three amendments and two revisions have been made to the plan; and</p> <p>WHEREAS, a comprehensive external review of the North Carolina Blue Crab Management Plan was performed in 2023; and</p> <p>WHEREAS, the most recent compiled biomass stock assessment was completed in 2018, and the North Carolina Division of Marine Fisheries (NCDMF) has advised that it is currently working on a new Blue Crab Stock Assessment, which is due in 2026; and</p> <p>WHEREAS, biomass stock assessment of the blue crab was calculated by trawling, and blue crabs are caught more productively by pot fishery; and</p> <p>WHEREAS, many of our crabbers have invited NCDMF biologists to ride along and observe the fishery as they are working it; however, the NCDMF has refused to entertain this concept of fishery management data collections; and</p> <p>WHEREAS, the blue crab fishery is complex and involves a variety of factors, such as market fluctuations, weather, water conditions, toxicity, salinity, currents, tides and hypoxia-none of which are mentioned in the current report's observations from the NCDMF biologists; and</p> |

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| | | <p>WHEREAS, trip ticket factors are pronounced in the adaptive management plan and show a parallel effect of less effort by the crabbers and the result of less landings of blue crab; and</p> <p>WHEREAS, a proposed 5-month closure of the fishery and/or a 10-bushel limit would have surmountable economic impact across the fishery, affecting our local communities; and</p> <p>WHEREAS, all of the NCDMF advisory committees recommended status quo of the blue crab fishery with no further restrictions;</p> <p>THEREFORE, BE IT RESOLVED, that the Dare County Board of Commissioners strongly opposes any further restrictions to the blue crab fishery until the 2026 stock assessment is completed, as well as a new comprehensive plan for collecting data of the fishery.</p> <p>This the 3rd day of November, 2025.</p> |
| Wanda Berry | North Carolina | The People here in Hyde County Love our Blue Crabs !! Many here make their living harvesting and supplying restaurants and seafood businesses with these delicious creatures of the waters here on NC's coast ! Please consider what further restrictions would do to our county and our livelihoods !!! |
| Janice Creel | North Carolina | Leave the blue crabs alone! |
| Taylor Halley | North Carolina | Blue crabs are a very essential part of NC fishing. It's one of the biggest in revenue and jobs. Please consider public opinion on the future of Blue Crab fishing. |
| Heath Fulcher | North Carolina | Alot of fisherman make there living off crabbing every year.This would destroy there livelihood! Also there's alot of people love eating blue crabs including me.you need to upto date science and don't do anything to the blue crab season or harvsting! |
| Brenda Davis | North Carolina | I love eating local fresh NC Blue Crabs. Please base management on up-to-date science and public input. |

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| Tyler Brewer | North Carolina | It can't get no crazier than this. Next thing you know you won't be able to do nothing |
| Michaila Daniels | North Carolina | Please keep the current quota for blue crabs, nc is a growing state and we need fresh local crabs to continue to be available for the consuming public. |
| Kara Garska | North Carolina | Blue crab is great for crab cakes! Yummy! |
| Charles Siggler | North Carolina | NC crabs have been on the dinner plate for a long time leave it like it is for the next generation. |
| Cindy Evans | North Carolina | Please leave the Blue Crab fisherman alone. If you would like to actually help wildlife in NC stop over development along our coastline |
| Cynthia Miller | North Carolina | Stop messing with the crab industry. And the shrimp! What is wrong with you?! You need citizens to tell you how wrong this ? Or do you just need to know if people are paying attention? |
| Daisy Vang | North Carolina | <p>My name is Daisy, and I am a 29-year-old second-generation Hmong woman whose life and cultural identity have been profoundly influenced by seafood, particularly blue crabs. Moving from Seattle to North Carolina at the age of eight was a difficult transition, but the traditions of the Carolina seafood community provided comfort, continuity, and a sense of belonging during a pivotal time in my life. Blue crabs became a powerful link between my Hmong heritage and my new home. The practices surrounding them—from harvesting to preparation—remain central to my family's celebrations and cultural traditions. They represent not only a cherished delicacy, but also family unity, cultural continuity, and the heritage I hope to pass on to my children.</p> <p>I respectfully ask that you recognize how deeply this species has shaped my community, my family, and my personal story. Blue crabs are not simply a food I enjoy—they are a lifelong passion and an essential part of my identity.</p> <p>As future policies are considered, it is vital that the NC Marine Fisheries Department incorporate the most current science and meaningful community input. North Carolina fishermen are the heart and</p> |

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| | | soul of this state's culture, and their experience, knowledge, and livelihoods must be part of every decision. |
| Pamela O'Neal | North Carolina | <p>Attention, North Carolina Marine fisheries commission:</p> <p>Please base the management of North Carolina blue crabs on up-to-date science and public input, not just your opinions.</p> <p>North Carolina blue crabs are a staple and necessity, not only to my family, but other others here in North Carolina.</p> <p>North Carolina blue crabs provide jobs for countless small family owned operations and for our livelihood.</p> <p>Thank you in advance for your attention in this matter.</p> |
| Christophe Elkins | North Carolina | <p>IMO, the estuarine striped bass fishery in the ASMA and CSMA systems should continue a moratorium (including the Roanoke-WRC). Moreover, the gill net ban should be continued. There will be too much bycatch of out of season striped bass and other important fish in the area. These recreationally importan fish represent a huge financial bonus relative the little financial gain from gill nets. Why is this data never presented at MFC meetings?</p> <p>I almost always support the DMF biologists data, but clearly their sampling in the Tar/Pamlico and Neuse rivers missed the mark this time. This was probably because of the high salinity pushing the striped bass upriver and they were not sampled. All of the reports I have heard from local fishermen support this thesis. Heck they were catching tarpon above the Little Washington bridge.</p> <p>Thanks for your service.</p> <p>Chris</p> |
| Wendy Wells | North Carolina | Please don't cap or take away our option to catch or eat blue crabs! These yummy delicacies have been placed here for us to enjoy like we have for many, many years! Leave blue crabs on our plate!! |
| Vernon Sadler | North Carolina | I am a third generation commercial fisherman, i have commercial fish all my life. I have crab potted, gill netted ,oystered, shrimped i have done it all from cape may nj to fernadina fla. I have see lots of changes along the way, from gear restrictions to just doing away with the whole fishery. I used to |

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| | | <p>flounder fish on the eastern side of the pamlico sound in the fall, dmf made us stop, just took that whole fishery away. I also used to crab dredge in the later months just to provide for my family and get thru our harsh winters, completely took that fishery away, and for no reason at all. I now own a fifty foot boat and i mainly drag for shrimp and crabs. In the later months from some time in November until sometime around the end of march i usually go dragging for crabs in the sound. I mainly drag around long shoal north and south of it to catch crabs,sometimes we drag other places but mainly there. I make a living for those months by being able to crab trawl, i can feed my family and keep my bills paid during this time. i cannot understand why the dmf is considering stopping me from making a living, if it's not trying to band shrimping it's now going to band crab trawling and i just don't understand why. Where is the sience behind this decision, what is the reason, seems i been reading that crab trawling only accounts for two percent of the total crab harvest in n.c. . I know that i rely heavily on my part of that two percent, without the ability to go out and drag for crabs i don't know how i'll make it thru the winter months. seems if i read correctly there are plenty of juvenile crabs they just don't make it to maturity. Well if you want to know why, i can tell you, There are more red drum than there has been in a long time and you can't even keep the big ones if you catch them they eat all day long and small crabs are one of their favorites. there are rock fish they love small crabs too. then you have bluefish they are like piranahs they eat all day and all night ,yet you can only catch three hundred pounds per day commercially. So therefore instead of closing crab trawling ,just maybe you should open season on some of these crab eating fish that you all are keeping around si they can eat all the juvenile crabs, there's your problem not crab trawling please do something to help the fishermen and not hinder them we are already struggling with low prices due to imports , i wake up every day wondering if this is going to be my last day at the job i love because, we are regulated to no end. is there any science to prove crab trawling is killing all the juvenile crabs , im pretty sure there isn't because it's not true. Thank you for taking time to consider my plea . Sincerely Vernon Sadler concerned commercial fisherman</p> |
| Joe Romano | North Carolina | <p>Re: Opposition to Adaptive Management Proposal for the Blue Crab Fishery Management Plan Dear Commissioners,</p> |

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| | | <p>For more than a century, blue crabs have fed North Carolina’s people and anchored its coastal economy. They’ve also confounded scientists, watermen, and policymakers alike with their natural boom-and-bust cycles.</p> <p>As you meet to consider adaptive management for the Blue Crab Fishery Management Plan, I urge you to vote no on this proposal. Not because stewardship is unimportant—but because the proposal before you mistakes bureaucratic control for conservation. It overlooks history, biology, and common sense in favor of reactionary frameworks that will divide stakeholders and weaken trust in this Commission.</p> <hr/> <p>1. The Fishery Has Always Regulated Itself Through Nature and Economics</p> <p>North Carolina’s blue crab fishery has survived and thrived for over a century without micromanagement. When prices drop too low, crabbers tie up their boats. When fuel, bait, and maintenance costs outweigh returns, effort naturally declines.</p> <p>This self-regulation, driven by economic reality, is one of the strongest conservation forces we have. The simple truth is that no crabber can fish a stock into oblivion—they’d go broke long before that ever happened.</p> <p>Just as importantly, fishermen themselves pioneered many of the tools that protect the fishery. Cull rings—now standard in every pot—were invented by crabbers to let small crabs escape and grow. These innovations didn’t come from policy memos; they came from generations of practical wisdom and stewardship born on the water.</p> <hr/> <p>2. The Biology Is Clear: Blue Crabs Are Built for Abundance</p> <p>The blue crab is one of nature’s most prolific creatures. A single mature female can produce 2–8 million eggs per spawn, and up to 24 million eggs in her short lifetime. Most larvae never survive predation or environmental stress—but this high-output, high-mortality cycle is what makes the species resilient.</p> <p>Scarcity and abundance are built into their biology. Crabs are opportunistic, fast-growing, and highly fecund. To believe that more regulation can override the forces of weather, salinity, habitat, and natural predation is to misunderstand the species itself.</p> |

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| | | <p>The crab's fate is written by tides, storms, oxygen, and grass beds—not by how many pots are pulled in any given season.</p> <hr/> <p>3. The Science Does Not Support Claims of Overfishing</p> <p>The Division of Marine Fisheries has admitted that its stock assessment for blue crabs is unreliable and out of date. Yet it now proposes an adaptive management framework that would allow for new restrictions—bushel limits and a statewide ban on crab trawling—without a valid stock assessment. Adaptive management, as currently proposed, gives regulators the power to act on perception, not peer-reviewed evidence. That is not precaution—it's overreach.</p> <p>Even more concerning, new peer reviewed research from NC State University (September 2025) contradicts the very premise that the stock is in trouble. That study found no measurable decline in juvenile crab abundance over the past 25 years. Juvenile crabs remain plentiful, especially in western estuaries and seagrass beds once thought marginal.</p> <p>If young crabs are still abundant, then recruitment isn't the problem. The challenge lies elsewhere—likely in predation, habitat, or water quality, not fishing pressure. Regulation aimed at crabbers won't fix what's happening in the ecosystem.</p> <hr/> <p>4. The Real Drivers of Abundance Are Environmental, Not Regulatory</p> <p>Across the Atlantic and Gulf coasts, crab populations rise and fall in sync with habitat loss, storms, salinity shifts, and predator surges—not harvest levels.</p> <p>In North Carolina, expanding populations of drum, sheepshead, skates, and invasive blue catfish are consuming juvenile crabs at unprecedented rates. Meanwhile, runoff and algal blooms are suffocating the nursery habitats crabs depend on.</p> <p>Yet instead of studying these changes, the Division is focused on writing new rules. It's managing by spreadsheet, not by science.</p> <p>Without better collaboration between DMF, NC State, Duke, and UNC marine scientists—without a serious look at habitat, hydrology, and food-web dynamics—we risk tightening rules on the wrong people while ignoring the real causes of decline.</p> <hr/> |

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| | | <p>5. Fishermen, Scientists, and Conservationists Should Be Allies—Not Opponents</p> <p>This Commission includes commercial fishermen, recreational anglers, and scientists. Every one of you wants healthy crabs, clean water, and a sustainable future. But sustainability must rest on sound evidence and shared responsibility, not scapegoating.</p> <p>Commercial crabbers are not the enemy. They are observers and data points on the water every day. Their livelihoods already depend on sustainability. The same is true for guides, tackle shop owners, and seafood dealers whose communities rely on access to both wild food and fair opportunity. Let's not repeat the cycle of divide and distract—where crabbers are pitted against one another and against other user groups while the real ecological issues go unstudied. True conservation is not about punishment; it's about partnership.</p> <hr/> <p>6. A Smarter Path Forward</p> <p>Rather than adopting an adaptive management framework that substitutes perception for proof, the Commission should:</p> <ul style="list-style-type: none"> • Fund real, field-based science on predation, larval transport, and habitat change. • Rebuild collaboration between DMF biologists, universities, and working watermen. • Acknowledge economic self-regulation and the existing conservation measures already in place. • Integrate recreational harvest data, which remains a major blind spot in stock estimates. • Invest in ecosystem-level research, not just fishery-level control. <p>The Commission has the power to steer this discussion toward evidence-based management rooted in partnership and transparency. That's the North Carolina way.</p> <hr/> <p>7. In Closing</p> <p>The blue crab fishery doesn't need another layer of rules—it needs renewed curiosity, collaboration, and respect for the natural systems that actually determine abundance.</p> <p>To impose adaptive management now—without a credible assessment, without consensus, and against new scientific findings—would not be adaptive at all. It would be arbitrary.</p> <p>I urge you to vote no on adaptive management for the Blue Crab FMP.</p> <p>Let's recommit to a path grounded in real science, shared stewardship, and the recognition that the</p> |

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| | | <p>blue crab has always been, and remains, a story of resilience.</p> <p>Respectfully,</p> <p>Joe Romano</p> <p>Commercial Fisherman,</p> <p>Former Fishery Advisor</p> <p>Co-Owner Seaview Crab Company, Wilmington, N.C.</p> |
| Katie Morgan | North Carolina | <p>Please don't change the blue crab laws. I live in Colington, NC and it will affect my neighbors and friends tremendously.</p> |
| David Gallop | North Carolina | <ol style="list-style-type: none"> 1. Ncdmf has ignored public input,northern and southern advisory committee and crustacean committee recommendations. 2. Most recent studies in Chesapeake stock assessment and by David Eggleston in nc show there is a disconnect in spawner stock abundance and juvenile abundance. The juvenile abundance remains fairly constant from one year to the next and is mostly influenced by environmental conditions. 2018 was the record for total rainfall in nc and 2020 was the second highest total rainfall ever. It has taken awhile to recover. 3. The proposed 30 bushel limit for September thru December is ridiculous. It is directed towards one specific area and one specific group of crabbers. The high liners of the fleet who are responsible for 80 percent of the states landings. It is nothing more than a reallocation of who catches them where they are caught and when. The crazy thing is this recommendation is published two weeks before the meeting to vote on it. 4. This is a prime example of why the division has no credibility. If ever there was an opportunity for cooperation this was it. 5 If this passes some of us are looking at a 25 to 30 percent reduction in income not 7or 8 percent. Therefore I urge the commission to vote no on this or any other asinine proposal that will destroy the industry and not make any difference in crab stocks. |

| Name | State | Please type your comments in the box below. |
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| Amy B Garretson | North Carolina | Please vote to ensure continued access to NC Blue Crabs!! So many NC fishermen have already left the industry. Our Crabbers are hanging by threads to keep our traditions and fresh NC Seafood! Please do not strip our families of the right to harvest blue crabs and therefore provide for their families. |
| Sara Hallas | North Carolina | I'm strongly opposed to the adaptative management measures under consideration for the Blue Crab fishery. I do not think any action needs to be taken at this time. As there are many other factors that are at play that haven't been explored and more data is needed to make an informed decision. This isn't an acceptable solution until more information is gathered to better understand the intricacies of the blue crab life cycle. Please consider alternative paths forward. Thank you. |
| Chad ONeal | North Carolina | <p>My name is Chad ONeal. I am a commercial fisherman from Wanchese, NC.</p> <p>I am against the proposed regulations for the blue crab fishery.</p> <p>You're telling us that the crab population is overfished and declining but that is not what we are seeing on the water.</p> <p>The stock assessment model is designed to show overfishing regardless of regulations implemented.</p> <p>If you shut it all down tomorrow, overfishing would still be occurring.</p> <p>All the regulations in the world won't fix a broken system and flawed data.</p> |
| David ONeal III | North Carolina | <p>My name is David O'Neal III. I am a commercial fisherman and crabber from Wanchese, NC. I am opposed to the proposed regulations for the Blue Crab fishery.</p> <p>I submitted public comment about this previously but to be honest, I feel I like it falls on deaf ears.</p> |

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| | | <p>Despite what a lot of people say about commercial fishermen not caring about sustainable fisheries, I actually do. However, I don't believe all "the sky is falling" data that DMF cranks out. Apparently no one else does either because the stock assessment failed peer review.</p> <p>In my opinion, this just regulating because you can. This fishery is producing more landings per participant than it did at the highest landing levels ever recorded. At the same, the number of participants is decreasing every year. Not because of a lack of crabs but because the old guys are aging out and very few young people are getting into the fishery.</p> <p>At the advisory committee meetings, the biologist stated they were trying to figure out how to get more participants back into the fishery. How is that? By regulating those of us who are already in it out business? We need less landings but we need more crabbers. That makes a lot of sense doesn't it?</p> <p>The entire FMP process needs an overhaul. Data collection and sampling methods need to be updated. Environmental and geographical changes need to be taken into consideration.</p> <p>This is the most valuable commercial fishery in the state and the proposed regulations will destroy it.</p> <p>I could go on and on but who is actually listening.</p> <p>David O'Neal III</p> |
| SHERRY Tyson | North Carolina | <p>I'm from Washington NC. my family is from RoseBay nc. They were farmers. They lived off the land and waters of Hyde county. You all are taking our livelihood away. Fishing , shrimping, and crabbing is the way of life for Eastern NC. WHAT WILL IT TAKE FOR YALL TO STOP REGULATING OUR LIVELIHOODS</p> |

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| | | WE DEPEND ON THIS INDUSTRY TO FEED FAMILYS AND MAKE A LIVING TO PAY BILLS. STOP YOUR NONSENSE |
| Arturo olan | North Carolina | I love eat blue crabs and is also our job source in the county any negative actions will affect our community of hard workers in this area |
| Jenny McGuire | Virginia | I love eating Blue Rand!! |
| Sandi ekleberry | North Carolina | I feel like this would effect a lot i of working families like mine! |
| Dean Strickler | North Carolina | Please do not change any legislation on the Blue Crab industry. It is wonderful to have products from NC that aren't from foreign lands that are tainted with all kinds of nasty contaminates. The phrase that goodness grows from NC is a fact ! Please stop these political nuts from ruining our state. As a life long born and raised citizen of North Carolina if you don't want our blue crab, move out of our state. Sincerely a concern voter. |
| Lisa Camilli | Pennsylvania | Please don't put new restrictions on blue crabs! If done, this will negatively effect the lives and incomes of many North Carolina residents. And folks like me who love eating this delicacy from your waters. |
| MILLARD jefferson | North Carolina | Why are you messing with the blue crabs everyone loves them .you couldnt stop shrimping so now u messing with the crabs |
| Ward Bradshaw | North Carolina | Please let commercial fisherman continue to make a living in NC! |
| Wendy Carter | North Carolina | Blue crab should remain available for public consumption. They are a great food and I feel they should remain available. Thanks |

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| Gayle Troyer | North Carolina | <p>We believe the DMF is acting beyond their legal authority in attempting to implement adaptive management for blue crabs. Any action would violate the Blue Crab Fishery Management Plan and North Carolina law, because no valid up-to-date stock assessment exists to support further management recommendations.</p> |
| Frances-Ann Moran Criffield | North Carolina | <p>I love eating NC Blue Crabs. Once again, NC Fisheries needs to base management on up-to-date science and public input. I don't know why this is so hard, but your failure to do so is not only crushing the communities along the coast, but it goes against a national directive to prioritize American seafood over foreign seafood which contains many dangers for consumers.</p> <p>It is our job as coastal communities to feed the country. I really wish the Marine Fisheries would get on board and help us do that. One way you could do it would be advocate for stronger restrictions on the building of marinas and other structures in our critical coastal areas. We don't want to end up like South Carolina did with a crushing impact from overbuilding in some regions of the coast.</p> <p>Being good at the science means getting to the right answers with the most up-to-date data. And using all of the data like what are our rivers runoff doing to our water quality? What are all of those super rich builders who get cozy with the politicians doing to our environment?</p> <p>Speaking of, have you published the new data on Bogue Sound because those of us out on the water know what it's going to say about the shrimp population.</p> <p>Thank you for your attention in this matter. Best regards, Frances-Ann Moran Criffield</p> |
| Amy McCullagh | North Carolina | <p>Opposed to all these measures without the scientific data to back up these baseless claims. Let our fisherman make a living and provide delicious seafood from NC to consumer's plates! Stop the madness!</p> |

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| Herman Manley | North Carolina | Being a commercial fisherman I know how important it is for us to have blue crabs available for us to catch. They've already taken stripper, flounder, shad, part of our mullet season and make almost impossible to fish with the proclamation they come up with, all we have is crabs. To take that would be to kill off what's left of our industry. |
| Charlotte Fields | North Carolina | My family and I love eating blue crab! Please base management on up-to-date science and public input. It is never a good idea to regulate anything by pie-in-the-sky methods or ideas. |
| Julie Hodges | North Carolina | <p>Our coastal communities have survived for generations because of hardworking commercial crabbers who provide food, jobs, and culture across Eastern North Carolina. The proposed NC DMF bushel limits threaten not only the livelihood of these families, but the very heritage our communities were built on.</p> <p>Crabbers are already heavily regulated, closely monitored, and required to report their harvests. Introducing arbitrary bushel limits—without clear biological justification—creates unnecessary financial strain on small, family-owned operations while doing little to meaningfully improve stock health. Most of these fishermen operate on thin margins, and limiting their catch will directly reduce their ability to support their families in a time when fuel, gear, and living costs are already at record highs.</p> <p>For decades, crabbers have been responsible stewards of North Carolina's fisheries. They rely on healthy blue crab populations to survive and have consistently adapted to rule changes, gear restrictions, and seasonal closures. They are partners in conservation, not the problem. Any new regulations must be based on sound science, transparent data, and genuine collaboration with the people who work these waters every single day.</p> <p>Bushel limits, especially those not grounded in up-to-date stock assessments or stakeholder input, do not reflect the reality of the fishery. They punish the few remaining commercial watermen—many of whom are multi-generational families whose knowledge and stewardship far exceed what any paper proposal can capture.</p> |

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| | | <p>We urge the NC DMF and the Marine Fisheries Commission to suspend consideration of bushel limits and instead work with crabbers through science-based management that protects both the resource and the communities that depend on it. Sustainable fisheries and thriving coastal economies are not mutually exclusive. But regulations that cripple working families while offering no measurable conservation benefit serve no one.</p> <p>Our crabbers deserve a voice. They deserve fairness. And they deserve regulations rooted in facts—not fear or pressure.</p> |
| Jennifer Salter | North Carolina | Save our access to blue crabs!!! There is nothing better than a big pot of gorgeous blue crabs from NC. Reduced access is not what North Carolinians want. Further, as a significant industry in our state, this would negatively impact so many families. |
| Sherrie | North Carolina | Please do more studies before you decide on taking away our heritage and living. There's plenty of crabs. We have enough laws now? |
| Steven Brewster | North Carolina | I've been told by several commercial crabbers in the Pamlico region about how bad the blue crab situation has become. When the fishermen are noticing a decline, it's well past time to make some serious changes. Let's not repeat flounder and simply delay the inevitable until we wind up in a hole that we may never get out of. |
| Sheryl | North Carolina | Please do not destroy our crab industry basing your decisions with uninformed, misleading information or information not based on science. Protect our commercial fishermen. We support our local seafood. The public wants nothing to do with chemical laden imported seafood that we do not know where it was caught, i.e. the radioactive shrimp recently found. Please do not cut off our crab industry, destroying more jobs. Have a heart. |
| walter fowler | North Carolina | I have fished the Carolina coast since the mid 1960's to provide fresh fish for family. During the early decades the sounds, waterways, and inlets had large schools of blues, mullet, menhaden etc. |

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| | | <p>especially in the spring/fall. When flounder gigging the bottoms were covered in small fish and crabs....too numerus to count. I saw shrimp boats in Shallotte parking at docks with deck a foot deep in dead fish...crabs were smushed with a piece of 2x4 to make it easier to cull the shrimp out. The fish, crabs and all other marine life shoveled overboard with snow shovels. Shrimpers today say bycatch is way down which is true. Mostly because the millions of fish and other marine animals dumped overboard every year has reduced fish stocks to a fraction of what they once were. I don't think the younger generations today realize how much the fish stocks have dropped from years past. There doesn't appear to be any accountability for discarding tens of millions of fish and other marine animals back into the water as trash. This includes turtles and other protected species such as grouper and black sea bass. Maybe that is why NC Wildlife Federation and CCA filed lawsuits against trawling nursery waters. Instead of Incidental Reports maybe we need retribution to the state for loss of public resources. I have seen small turtles left in crab pots to drown. I've had commercial fisherman as friends over the years and not against them fishing for profit. I just can't justify how its ok to kill so much as part of the trawling process. Seems like every time I talk to a friend or someone on the job about coastal fishing...they tell me they have a commercial license so they can keep more fish. These people all have full time employment as construction, plumbing, etc. and are not full time commercial fishermen. So, we no longer see the waters with large dark schools mullet, bluefish, menhaden, and baitfish moving with the tides. Much of the shallows look like the surface of the moon with very few fish or crab. A drastic view compared to even 20...30 years ago. A licensed citizen of North Carolina should be allowed by law to be able to harvest a reasonable amount of fish for their family.</p> |
| Sue Frost | North Carolina | <p>Will you ppl tell me what your trying to do with the CF industry? It's every time you turn around your trying take another species away.If it's not FLOUNDERING it's SHRIMPING if not that it's sum kind FISH...Now CRABS..Why you ppl keep right on and on for? What is gonna be left thats gonna be local for the CF to catch? These beach fisherman thats been fishing for generation, and you bout got that eleminated.You took the floundering away? Ehat are you ppl thinking? Evidently you want to see nothing but imports.Why do you ppl thats setting on that Devils seat keep right on taking away ? Why do you want to take ppl's livelihoods away? Do you not have a conscious? Leave these men alone</p> |

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| | | <p>,let them work and provide for their families. You ppl are so heartless, you don't care for nobody...you should be ashamed of yourselves..How would you feel if everytime you turn around and your job was threatened?</p> <p>Please leave these CF alone and let them work...Stop letting the CCA determine what's right, cause they are destroying you and CF lives...Money talks n all else walks...and like they say money is the root of all evil, which is true and so is RALEIGH!! Stop b4 you loose what you think you have earned honest...let's these men work!!</p> <p>██████████</p> |
| Paul Beals | North Carolina | <p>I wish to address the proposed regulations concerning the Blue Crab fishery.</p> <p>The Division of Marine Fisheries did not provide a valid, accurate, updated stock assessment between FMP time period as required by law. DMF's 2023 stock status report failed peer review. DMF is now trying to rely on data from the last century when we had five times the participants in the fishery (DMF stated over 2,000 participants with crab landings in 1996 vs less than 500 in recent years).</p> <p>The proposed bushel limit is targeting the top producers in a specific region. Bushel limits without a tiered license system and other measures will be detrimental to the fishery by driving out those who have built their business through decades of work and innovation.</p> <p>The Marine Fisheries Commission, The Northern Regional Advisory Commission, The Southern Regional Advisory Commission and The Crustacean Advisory Commission all agreed in previous votes to not act until updated, proper data collection is established.</p> <p>Using DMF figures, Blue Crab sales impacts for 2024 were over 60 Million Dollars. The proposed bushel limit will cause the triggering of the recently passed NC REINS ACT that requires legislative approval for any law having a financial impact of such magnitude.</p> <p>If The Division of Marine Fisheries pushes to ignore the advisory committee's recommendations and forces the regulations, a duty will have been breached that will cause significant damages.</p> <p>The Division WILL be held accountable.</p> |

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| Judy Knox | North Carolina | Please leave our blue crab alone. I love to eat fresh local blue crabs and it helps our local fisherman. They follow the rules and you need to check into how correctly they do the process. |
| Chelsea Anderson | North Carolina | <p>Please reconsider the blue crab limits being proposed by the NCDMF. I have been observing the crab fishery for 30 years. I have seen the populations fall and rise over the years—without limit interventions. There are less commercial harvesters than 30 years ago—this feels like bureaucratic overreach on one of the last viable commercial fisheries in this State.</p> <p>Will questions be answered at this meeting as to why this limit is being imposed? Where is the proposed population data being extracted from? How long is the data set? Are we looking at trends over a year, five years, 20 years?—where is the trend data coming from? Is NCDMF setting their own pots to study, if so where, what kind of pots and what kind of bait?— or are they looking at commercial sale data?</p> <p>Also please consider the economic impact this decision will have on local NC fishing families.</p> <p>Please be transparent with this decision and consider input from the community.</p> <p>Thank you, Chelsea Anderson</p> |
| Eric Sawyer | North Carolina | I don't support the purposed bushel limits and believe it will hurt fisherman and the economy..I believe these measures are too serve...I don't believe the data that is being used to justify this is valid for the future of crabbing... can't base things on old historical numbers.. there is not the same effort in the fishery or as many crabbers on the water... biggest thing effecting crabs is climate..water quality...I believe if those things are right there will be plenty of crabs . thanks |
| Martha Mancera | North Carolina | For the fishermen is a priority on catching blue crabs for their livelihoods and to support the local economy . We don't need import crabs from other countries, where they don't comply with |

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| | | regulations. By allowing local fishermen to continue their work, we can support their families and a sustainable industry, and they respect the rules. Please we need more support for these people. |
| Mandy Murphy | North Carolina | Why would we want or have to rely on getting our blue crab from Maryland or another state when we as NC residents can get them from our home state and support our local fisherman and businesses in the process. Why would we not be allowed to fish our own waters for crab (and other seafood for that matter) to put on our tables to feed our families. Stop trying to regulate our fisheries out of business for commercial and recreational fisherman. |
| Faye Denny | North Carolina | nd I am so very tired of you people taking away our ability to catch and eat fish . You do not have any idea as to how many fish or crabs are in the ocean.... or in the .. One fishis not going to feed my family. a few crabs is not going to feed my family..... STOP.....Once we enjoyed eating fresh fishsomething that we did not have to spend much to on to catch.....LEAVE OUR COMMERCIAL FISHERS ALONE AND US TO.... go to the north ,Virginia catch what you want.....go to SC catch what you want....enough to feed the family... HERE NOTHING... |
| Susan Moody | North Carolina | WHY! Why keep creating problems where there are none harvesting crabs has been going on for hundreds of years in this county/world it's the livelihood of many people are y'all bored and just trying to come up with new ways to show that you have a job need or would you just prefer that everything just be imported, I love our local Seafood and it is part of my livelihood |
| Heather Paulson | North Carolina | How about yall leave the NC Commercial Fishermen alone! Enough is enough already! They are just trying to make a living... they definitely aren't trying to get rich! |
| Steven Ruhle | North Carolina | I am totally against the 30 bushel trip limit and the ban on crab trawling. The net crabbers have dwindled away so much thy cannot even put a dent in the stock anymore. |
| Molly Brite | North Carolina | Reconsider taking this unnecessary action! To cut the daily limit by almost half on the many good days of crabbing affects so many people!! The crabbers, helpers, dock help, entire blue crab industry.....will suffer a tremendous loss and have a negative economic impact mainly in North Carolina but also beyond. Crabbers work hard the majority of the year 5-6 days a week while |

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| | | following policies, laws, and more. This is a viable and healthy food source for several hundred thousand of NC residents and the many tourist that visit our great state and beyond. Thank you for reconsidering this drastic action. I am a born and raised Knotts Island native, Currituck County will remain my forever home. Raised on the Currituck Sound, this hits hard!! Many family members and friends up and down the County give their life everyday working hard in the crab industry. Thank you again for reconsidering!! |
| Robert Ruhle | North Carolina | As a lifelong commercial fisherman and one of the current NC representatives to the Mid Atlantic Fisheries Management Council, I am deeply concerned about any regulations banning a specific gear type without having any supporting scientific data or research. I fully understand the need for fisheries management and support decisions that are based in science not emotion. I fear that the proposed changes eliminating a specific gear type / harvest method with no supporting data would be opening the door once again go down the road of this past year's shrimp ban. The management process needs to be a balance between all user groups to ensure long term sustainability of the resource and stability to the industry. |
| Bethany Raszkowski | Pennsylvania | I want to keep North Carolina Blue Crabs on my plate. i love eating NC Blue Crabs and want management based up-to-date science and public input. |
| Adam Spencer | North Carolina | A 30 basket limit on crabs would be devastating for my crabbing business. My livelihood would be taken away it would cause a great hardship for most crabbers Please don't put me out of business please vote no to the 30 basket limit thanks Adam Spencer |
| Patrick tuck | North Carolina | This is my lively hood and it would be devastating to me and my family if a 30 bushel limit is added please say no to a 30 bushel limit and let us stay in business thank Patrick tuck |
| Doug Dixon | North Carolina | A 30 basket limit would be devastating and cause a hardship for me and my family. Please vote no to a 30 basket limit thanks Doug Dixon |

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| Zeb Mayo | North Carolina | A 30 basket limit on crabs would be devastating and a hardship for crabbers. Please vote no to a 30 basket limit thanks Zeb Mayo |
| Amanda VanDyke | North Carolina | Please, no more restrictions on the catching and harvest of blue crabs. Thank you! |
| Cindy Hocutt | North Carolina | Please leave NC seafood alone. This is not political, only politicians make these stupid laws rules got their gain. I don't ever read articles about other states being bullied by the rich non fishers! |
| Philip Midkiff | North Carolina | There should not be any changes without supporting research that justifies a change. Politics shouldn't play a part in any decision! |
| David Hawkins | North Carolina | The crab industry is very vital to Hyde Co community and employees . Where some of hardest working people I know work in the crab industry. From crabbers, pickers, shippers, small business owners will be affected. Closing or limiting any part of the crab season will impact jobs and income during the best harvest time of the year. |
| Laura Kilian | North Carolina | <p>November 17, 2025</p> <p>RE: Blue Crab FMP Amendment 3 Adaptive Management</p> <p>The North Carolina Farm Bureau Federation (NCFB) is this State's largest general farm organization representing the interests of farm and rural people in North Carolina. This letter is to comment on the proposed Blue Crab FMP Amendment 3 Adaptive Management.</p> <p>NCFB represents the interests of approximately 31,000 farmers in North Carolina, who produce a wide variety of crops throughout the State, including, but not limited to, sweet potatoes, cucumbers, strawberries, corn, wheat, soybeans, tobacco and aquaculture harvests. These farms are businesses who feed the citizens of this state, country and world. We support the right of NC citizens to have access to foods produced on our lands and from our waters.</p> |

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| | | <p>NCFB believes that access to our state's fisheries must be grounded in sound science or the best available data. Yet the absence of a stock assessment for blue crab means there is no clear evidence that overfishing is occurring, leaving the justification for Amendment 3 incomplete at best. Advancing this proposal without reliable, transparent science runs counter to this.</p> <p>Thank you for the opportunity to comment on this matter.</p> <p>Sincerely,</p> <p>Laura Kilian Associate State Legislative Director</p> |
| Patrice Clarke | North Carolina | I oppose any restrictions without scientific data to support your recommendations. |
| Lisa Tose | Virginia | The NC seafood industry is vital not only to NC but to all east coast states who purchase your products. I am a buyer. I refuse to entertain imported seafood when we have an industry who respects sustainability and has creative abilities to engineer better gear practices. |
| Bruce Schmidt | North Carolina | I am a recreational crabber living in Nags Head and you have made a lot of changes to fishing seasons and limits which I question aren't necessary and my hope is that you don't start messing with crab seasons or sizes |
| Dennis Foreman | North Carolina | <p>As a North Carolina crabber, I'm asking the Division and the Commission to hold off on any new blue crab regulations until the next Fishery Management Plan is completed.</p> <p>From the waterman's perspective, the situation is simple:</p> <p>We are being asked to accept new regulations without a current stock assessment, without fresh science, and without the guidance of a legally required FMP. The last assessment has expired and</p> |

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| | | <p>cannot legally or scientifically be used to justify management actions. For a fishery as important as blue crab—North Carolina’s number one commercial fishery—regulating without good science is reckless.</p> <p>Crabbers have already taken heavy cuts over the last several years. We’ve lived with gear changes, area closures, and season restrictions. We have done our part, and most of us did it without fighting because we were told the science supported it. But now we’re being told to accept more changes with no science at all behind it.</p> <p>That’s not management—that’s guessing.</p> <p>If NCDMF truly wants to manage this fishery responsibly, then follow the roadmap already in law: complete a new stock assessment, build the next FMP, bring the public and advisory committees into the process, and then act. That’s how real fisheries management works. Anything else is just shooting in the dark—and we’re the ones who take the hit.</p> <p>Every advisory committee told you the same thing: do not move forward with new blue crab regulations until the next FMP. That’s the science voices, the industry voices, and the community voices all aligned. It’s extremely rare for everyone to be on the same page, and when they are, it should matter.</p> <p>Crabbers are not asking for special treatment. We’re asking for fairness, for transparency, and for decisions based on current facts—not outdated data or outside pressure.</p> <p>Let the next FMP do its job. Let the science catch up. Stop rushing into changes without the foundation they require.</p> |

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| Dennis Foreman | North Carolina | <p>As a North Carolina crabber, I'm asking the Division and the Commission to hold off on any new blue crab regulations until the next Fishery Management Plan is completed.</p> <p>From the waterman's perspective, the situation is simple:</p> <p>We are being asked to accept new regulations without a current stock assessment, without fresh science, and without the guidance of a legally required FMP. The last assessment has expired and cannot legally or scientifically be used to justify management actions. For a fishery as important as blue crab—North Carolina's number one commercial fishery—regulating without good science is reckless.</p> <p>Crabbers have already taken heavy cuts over the last several years. We've lived with gear changes, area closures, and season restrictions. We have done our part, and most of us did it without fighting because we were told the science supported it. But now we're being told to accept more changes with no science at all behind it.</p> <p>That's not management—that's guessing.</p> <p>If NCDMF truly wants to manage this fishery responsibly, then follow the roadmap already in law: complete a new stock assessment, build the next FMP, bring the public and advisory committees into the process, and then act. That's how real fisheries management works. Anything else is just shooting in the dark—and we're the ones who take the hit.</p> <p>Every advisory committee told you the same thing: do not move forward with new blue crab regulations until the next FMP. That's the science voices, the industry voices, and the community voices all aligned. It's extremely rare for everyone to be on the same page, and when they are, it should matter.</p> <p>Crabbers are not asking for special treatment. We're asking for fairness, for transparency, and for</p> |

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| | | <p>decisions based on current facts—not outdated data or outside pressure.</p> <p>Let the next FMP do its job.</p> <p>Let the science catch up.</p> <p>Stop rushing into changes without the foundation they require.</p> |
| Ryan Speckman | North Carolina | <p>Vote NO for increased crab regulations</p> <p>There doesn't seem to be any science justifying the proposed crab regs...in fact, the science is suggesting otherwise. Specifically the NCSU and Sea Grant study released in September which suggests that environmental factors are creating a bottleneck, and it is NOT due to overfishing. We have also seen a resurgence in crab landings the last couple of years.</p> <p>This will hurt the seafood industry in many ways. Not to mention reducing access to a public trust resource. Pump the brakes on new regs and let our scientists figure out what's causing the bottleneck in blue crab recruitment. There are so many red flags for water quality, changing environment, etc. Let's focus on the things that matter, and not put people out of work or deny access.</p> |
| Tara Foreman | North Carolina | <p>I'm asking for something simple, responsible, and fully grounded in North Carolina law: press pause on any new blue crab regulations until the next Blue Crab Fishery Management Plan is completed. The purpose of an FMP is clear. It is the legally required, science-based roadmap for how we manage a species. It lays out goals, objectives, stock assessments, management triggers, and the adaptive tools that can be used. Under FRA 113-182.1, regulations are supposed to flow from that plan—not be created in a vacuum and not be based on outdated or incomplete information. Right now, North Carolina does not have a current, valid stock assessment for blue crabs. The last assessment has exceeded the five-year window and cannot be used for management decisions. That is not just a technicality—it is the scientific foundation of any responsible regulation. You cannot adjust harvest levels, seasons, gear, or effort without knowing the actual status of the stock. If the Division or the Commission moves forward with major regulatory changes now, it would be</p> |

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| | | <p>doing so without a current benchmark, without the structure of an FMP, and without the transparency that the law requires.</p> <p>And importantly, you would also be going against the very advisory system that North Carolina set up to guide you.</p> <p>Every relevant advisory committee—the regional ACs and the Shellfish/Crustacean AC—advised that no new blue crab regulations should be pursued until the next FMP is developed. These committees exist for a reason. They bring together commercial fishermen, scientists, dealers, recreational representatives, and community members to provide grounded, real-world input. They are the connection between policy and the people who live with the consequences. When every advisory committee agrees on something this significant, it deserves real weight.</p> <p>Ignoring the advisory committees undermines public trust, weakens the collaborative process, and signals that stakeholder input is optional rather than essential.</p> <p>The blue crab fishery is also North Carolina’s number-one commercial fishery by value, supporting thousands of working-watermen in our most economically fragile coastal counties—Hyde, Tyrrell, Beaufort, Pamlico, Carteret, and others. These Tier 1 and Tier 2 counties depend on stable, predictable management. Making changes without current science threatens not only the resource but entire local economies—processors, truck drivers, seafood dealers, and families who depend on this fishery every day.</p> <p>We all want the same thing: a healthy crab population and long-term sustainability. But the path to that is not rushed regulations—it's the process already laid out in statute. Develop the next Blue Crab FMP, complete a valid stock assessment, incorporate advisory-committee guidance, and then take action.</p> <p>The next FMP is already scheduled. That is the appropriate place to reevaluate management strategies, consider new data, look at environmental drivers, and apply adaptive management tools the law actually allows.</p> <p>So I ask this Commission to: follow the process, follow the science, and follow your advisory committees. Wait for the next Blue Crab FMP before making new regulatory decisions. North Carolina’s working-watermen, coastal communities, and most valuable commercial fishery deserve management that is thoughtful, lawful, and scientifically defensible.</p> |

| Name | State | Please type your comments in the box below. |
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| Josh Spencer | North Carolina | <p>I'm speaking as someone who works on the water every day. I run crab pots for a living, and I depend on this fishery to support my family—just like hundreds of other crabbers across Eastern North Carolina.</p> <p>What we're asking for is straightforward: don't make new blue crab regulations until the next Fishery Management Plan is in place.</p> <p>Right now, the Division is talking about changes without having the most basic tool that responsible management requires—a valid stock assessment. The old assessment is past its usable window. Everyone knows it. Without a current assessment, nobody—crabbers, scientists, or managers—can say with confidence what the stock looks like today.</p> <p>When you regulate without science, it doesn't hit the paper—it hits the people. And for us, it hits hard.</p> <p>We've already seen big changes in the last few years. We adapted. We tightened up gear. We dealt with shorter seasons and new rules. We did it because we were told it was necessary and backed by data. Now we're being asked to deal with even more cuts—except this time, the science isn't there.</p> <p>That's not how North Carolina is supposed to manage fisheries. The law calls for decisions to come out of the FMP, not ahead of it. The FMP process is where the stock assessment is updated, where the triggers and adaptive tools are evaluated, and where managers actually work through the options with public input.</p> <p>And let's be clear: every advisory committee that reviewed this issue—every one—recommended waiting until the next FMP. These committees include people who know this fishery inside and out. If all of them say the same thing, that should matter.</p> <p>Crabbers are not trying to block management. We want sustainable crabs more than anyone. Our</p> |

| Name | State | Please type your comments in the box below. |
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| | | <p>future depends on it. But we also deserve a process that's fair, transparent, and grounded in current information—not guesses.</p> <p>Before you ask us to shoulder more restrictions, give us the science. Before you restructure an entire fishery, finish the FMP. Before you move forward, listen to the advisory committees and the people who have lived this fishery for generations.</p> <p>That's the right way to manage blue crabs.</p> |
| James Spencer | North Carolina | <p>My name is James Spencer, and I crab for a living here in North Carolina. I don't have a stack of reports in front of me. What I have is decades of real experience on the water—watching the seasons change, watching the crabs move, and watching regulations shape the way we make a living.</p> <p>What I want to say today is simple: now is not the time to add new blue crab regulations. Not without the next Fishery Management Plan. Not without a current stock assessment. Not without the process the law requires.</p> <p>Everyone in this room knows the last stock assessment is out of date. It can't be used to justify new rules. And without updated science, any regulation made right now is based on assumption, not fact. Crabbers cannot absorb more rules that come from guesswork.</p> <p>Our industry has changed a lot lately. We've adjusted gear sizes, we've changed how and where we work, and we've dealt with closures that cost us real money. We have done everything asked of us in good faith. But asking us to take more hits without new science crosses a line.</p> <p>And here's the key point: your own advisory committees told you the same thing.</p> |

| Name | State | Please type your comments in the box below. |
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| | | <p>The regional ACs.</p> <p>The Shellfish/Crustacean AC.</p> <p>The people who sit in these meetings, study the material, and understand the fishery from both the science side and the working-waterman side all said: wait for the next FMP.</p> <p>These committees were created to give you guidance. This time, their message was clear and unanimous. Ignoring them would be like asking for advice and then shutting the door when you don't like the answer.</p> <p>Crabbers aren't asking for anything special. We're asking for the same thing you ask of us: follow the rules.</p> <p>Follow the statute.</p> <p>Follow the FMP process.</p> <p>Follow the advisory committees that you appointed to help guide decisions.</p> <p>Let the new FMP be built.</p> <p>Let the new stock assessment tell the true story.</p> <p>And then, if changes are needed, we'll sit down and work through them the right way.</p> <p>Until then, the most responsible thing the Division can do is wait.</p> |
| Jonathan Lilley | North Carolina | <p>It is a crying shame that you have to beg to be able to go out and make an honest living in what is already a dying industry due to over regulation by the marine fisheries. I say this with all due respect let them go out and make a living some years are tough some are better but my goodness just leave peoples livelihood alone. Y'all work for the taxpayer don't handcuff these fisherman where they can't even pay the bills and make ends meet!</p> |
| Mandy Millard | North Carolina | <p>Love crabs! My family depends on crabbing to support us.</p> |

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| Jeannie Speckman | North Carolina | <p>-Blue Crabs are NC's #1 most valuable fishery by far</p> <p>-blue crab populations are well known to experience cyclic boom/bust population dynamics</p> <p>-NC crab landings peaked in the 1990s</p> <p>-from early 2000s until 2022, NC experienced a continuous downward trend in crab landings</p> <p>-in 2023-2025, NC has experienced an upward trend in crab landings</p> <p>-during the same time periods above (1990s-present), fishing effort has also experienced a downward trend (crab population does not equal crab landings)</p> <p>-DMF does NOT know the crab population</p> <p>-DMF is using flawed science to justify decision...the science FAILED peer review and was deemed "not fit for management decisions"</p> <p>-NCSU and Sea Grant just released a study in September showing that overfishing is not occurring and that there are environmental factors at play that are not being addressed by DMF</p> <p>Please do not restrict harvesting of this valuable public trust resource without viable scientific and confirmed data.</p> |
| Aarti McNamara | North Carolina | Please do not limit blue crab fishing, especially when your limitations are based on outdated, inaccurate science! |
| michael hayes | North Carolina | If you follow thru with limiting people's income by limiting their catch then subsidize there pay with state money. Isnt that what goverment does now??? |
| Jim Ingraham | North Carolina | Please take REAL action and significantly reduce the commercial blue crab harvest in NC. The numbers are down, anyone on the water regularly can see it. If we don't set up a chance for recovery, it is going to hurt everyone involved for years to come. |
| Frances M Lewis | North Carolina | <p>To Whom It May Concern:</p> <p>My comments are concerning the consideration of the proposal to limit or reduce blue crab harvests in North Carolina waters.</p> |

| Name | State | Please type your comments in the box below. |
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| | | <p>There are many ways to extoll the virtues of, the flavors in foods, the many ways that backfin blue crabmeat is enjoyed. I am certainly a fan and an avid consumer of blue crab meat - specifically blue crab harvested in local North Carolina waters. Let's keep it this way.</p> <p>As a daughter raised in the commercial fishing industry and with experience in the harvest of blue crabs; I would state that this proposal should defer it's attempt to reduce or limit harvests. Instead valid, robust scientific study should be engaged to prove harvest impacts on waters, nursery areas and sea beds. This study should be engaged in the near future and not be based on past impact studies collected for other purposes. In short - ask the question and get a proper answer of what is currently happening with blue crab population, reproduction rates and factors affecting the population numbers. Once that data is in hand -- a thorough study, not one cobbled together for expendant purposes; then consider your proposal of harvest rates. Why put hard working people out of business needlessly or for an agenda that has nothing to do with fishery interests?</p> <p>The blue crab industry obviously supports the culinary interests all along the coast and other areas, it employs people to work real jobs to process the product and move the product to buyers, but also provides work to those small businesses who support the fishermen with equipment to harvest, transport of products, packaging, ice providers etc. All of this is taxable and those taxes keep the commission employed too.</p> <p>Thank you for your consideration. Frances Lewis</p> |
| Kait Daniels | North Carolina | <p>I am a resident of Wanchese, North Carolina and many of my family and friends work in the Commercial fishing industry and harvest crabs. The proposed limitations to harvesting crabs would have devastating consequences on my friends and family's businesses and livelihood. It is unthinkable that limitations would be considered without appropriate stock assessment and scientific data indicating that these limitations are necessary. I request the DMF wait until they have</p> |

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| | | compiled the appropriate stock assessments before making drastic changes to a livelihood that supports so many. |
| Sara Jean Hallas | North Carolina | <p>This is an addition to my previous comment:</p> <p>I believe the DMF is acting beyond their legal authority in attempting to implement adaptive management for blue crabs. Any action would violate the Blue Crab Fishery Management Plan and North Carolina law, because no valid up-to-date stock assessment exists to support further management recommendations.</p> <p>Please reconsider this decision and management measures.</p> |
| Denny Reynolds | North Carolina | <p>I'm a working crabber here in North Carolina. I'm not here to argue or point fingers—I'm here to explain why moving ahead with new blue crab regulations right now would be a mistake.</p> <p>For crabbers, everything starts with the science. If the science shows a problem, we fix it. If the numbers back it up, we make changes. That's how it should work.</p> <p>But right now, there is no current, usable stock assessment for blue crabs. The last one expired. Everyone knows it can't be used for management decisions anymore. Without that assessment, nobody can honestly say what the stock looks like today.</p> <p>Regulations made without updated science don't hit a spreadsheet—they hit our livelihoods. That's why crabbers are asking you to wait until the next Blue Crab Fishery Management Plan. That plan is where the stock assessment gets updated, where the data gets laid out, and where management decisions are supposed to come from.</p> <p>And let's be straight: your advisory committees—the people you rely on for honest guidance—told you not to move forward with new regulations at this time.</p> <p>They went through the information.</p> <p>They listened to the Division.</p> <p>They listened to the public.</p> |

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| | | <p>And they all said the same thing: wait until the next FMP.</p> <p>Those committees exist for a reason. They give you the balance between the science and the people who live and work in these fisheries every day. When they all line up on a recommendation this clearly, it means something.</p> <p>Crabbers aren't against management. We depend on a healthy crab population more than anyone in this state. If the new FMP shows changes are needed, we'll be there at the table. But right now, the responsible thing—the fair thing—is to use the process that's already in place.</p> <p>Finish the new FMP. Complete the updated stock assessment. Let the science lead the decisions.</p> <p>Until then, putting more regulations on us without a valid scientific foundation isn't good management—it's unnecessary risk.</p> <p>We're simply asking you to wait until you have the right information in front of you. That's all.</p> |
| Charlie Carawan | North Carolina | <p>My name is Charlie Carawan, and I am speaking on behalf of Capt. Neill's Seafood a crabmeat processing plant located in one of North Carolina's Tier 1 counties. We employ 145 workers, and we rely on the harvest of 45 North Carolina crabbers to keep our plant operating every single day. In a county with some of the highest economic challenges in the state, our facility is one of the last steady employers left for local families.</p> <p>We want to be clear: we support responsible, science-based fisheries management. Our business survives only if blue crabs remain healthy and abundant. But we cannot support new blue crab regulations being created without a current stock assessment and without the guidance of the next Fishery Management Plan (FMP).</p> |

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| | | <p>The last blue crab stock assessment is expired. It cannot be used legally or scientifically for management decisions. Any new regulation introduced now would be based on outdated information—and the consequences of those decisions will land directly on rural workers, crabbers, processors, and families who do not have a safety net.</p> <p>For our plant, premature regulations mean:</p> <p>Reduced crab supply</p> <p>Shutting down production lines</p> <p>Sending people home with no paychecks</p> <p>Losing skilled workers who depend on steady employment</p> <p>Economic ripple effects through trucking, fuel docks, seafood dealers, and local stores</p> <p>In a Tier 1 county, these impacts are not theoretical—they are devastating.</p> <p>And we want to emphasize this: every advisory committee that reviewed this issue recommended waiting until the next FMP before considering new regulations. These committees include scientists, industry representatives, and community voices. When all of them agree so clearly, that guidance deserves real consideration.</p> <p>We also have the support of the North Carolina Department of Agriculture, which recognizes the economic importance of the seafood industry—especially in rural, economically distressed counties. The Department understands that decisions made without current science risk harming not only the crabbers and processors, but the broader agricultural and seafood economy that North</p> |

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| | | <p>Carolina depends on. Their support reinforces that this is not just a fisheries issue; it is a statewide economic issue.</p> <p>We are not asking for special treatment. We are simply asking for the Division and the Commission to follow the same process the public is required to follow:</p> <p>Complete the updated stock assessment</p> <p>Develop the next Blue Crab FMP</p> <p>Use current science to guide decisions</p> <p>Incorporate the recommendations of the advisory committees and the Department of Agriculture</p> <p>Once that process is complete and the science is updated, we will engage fully and responsibly in whatever management actions are needed. But moving ahead right now—without the foundation of a valid stock assessment or the structure of the FMP—puts nearly 150 workers, 45 crabbers, and the entire local economy at risk.</p> <p>For the sake of our employees, our crabbers, our community, and the long-term health of the fishery, we respectfully ask:</p> <p>Do not implement new blue crab regulations until the next FMP is completed.</p> |
| Frankie Armstrong | North Carolina | <p>My name is Frankie Armstrong, and I'm a crabber here in North Carolina. I'm just asking for something that makes plain sense: don't make new blue crab regulations until the new Fishery Management Plan is done.</p> <p>Right now, the stock assessment we're supposed to use is expired. We don't have updated science, and you can't manage a fishery the right way without knowing what the stock actually looks like.</p> |

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| | | <p>Making new rules without that information doesn't help the crabs, and it hurts the people who depend on this work to feed their families.</p> <p>Crabbers have already taken cuts, changed gear, and adjusted to every rule that's been put out. We'll do what needs to be done when the science is there. But we shouldn't be asked to take more hits based on old data.</p> <p>Your own advisory committees said the same thing: wait for the next FMP. That's the process the law sets up, and that's what everyone is supposed to follow.</p> <p>All we're asking is to use the right steps, get the new science, and then talk about changes if they're needed.</p> <p>Until then, please hold off on any new blue crab regulations.</p> |
| Andrew Dowdy-Green | North Carolina | <p>I am Andrew Dowdy-Green from Currituck county. submitting this comment regarding the proposed amendments to restrictions on commercial crab fishing.</p> <p>Core concern: The amendments as drafted may rely on data and assumptions that do not fully reflect current stock status, harvest histories, or the adaptive responses of fishing operations. Implementing restrictive rules without robust validation could impose unnecessary economic hardship on fishers and communities without clearly demonstrable conservation benefits.</p> <p>Data transparency: The justification for these restrictions should be accompanied by transparent methodologies, access to underlying datasets, and uncertainty analyses. Without independent verification or peer-reviewed support, it is difficult to assess reliability and repeatability.</p> <p>Unintended consequences: The proposed measures could significantly affect crews, processors, and local businesses. It is important to consider these secondary effects and seek mitigation where possible.</p> <p>Why peer review is needed: An independent review by fisheries scientists and economists can validate stock assessments, and socio-economic projections, and help refine measures for</p> |

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| | | <p>effectiveness and fairness.</p> <p>Requested actions:</p> <ol style="list-style-type: none"> 1) Pause final adoption of the amendments and initiate an independent peer review. 2) Publish data sources, methodologies, model code, and uncertainty analyses publicly. With caveats for each reason. 3) Maintain open, ongoing stakeholder engagement, with opportunities for comment, listening sessions, and amendments based on new information. 4) Consider phased or alternative measures to balance conservation goals with economic viability. <p>Closing: I support sustainable fisheries but urge decisions grounded in robust science, transparency, and equitable treatment of fishing families and coastal communities. I highly recommend not passing this amendment until further analysis with better fidelity is acquired.</p> |
| Corey Coleman | North Carolina | <p>Hello,</p> <p>I really enjoy eating Local, NC caught Blue Crab and Blue Crab products. Please reconsider your decision to limit commercial catches of Blue Crab. I will be unable to afford blue crab if this moves further.</p> <p>Thank you.</p> |
| Valerie Roe | North Carolina | The "science" doesn't support your proposal. Stop trying to put unnecessary regulations in place. |
| Arlene Meilich | North Carolina | Please do not take away our enjoyment of eating NC Blue Crabs. They are a pure delight for me and my husband. |
| Micah Daniels | North Carolina | As a native of NC and an avid seafood lover, I am strongly opposed to any new management practices to limit the harvest of blue crabs. The reduction in bushels will impact consumer's access (including mine) to NC crabs. Currently blue crabs are an affordable, healthy protein source in close proximity to its user group. I am a seafood dealer that sells picked crab from another NC seafood |

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| | | dealer. Crabmeat is important to our business in terms of retail but it is extremely important in terms the freight infrastructure in NC. Reducing the crab bushels will reduce freight trucks and hence harm NC seafood food pathways. Please do not pass this new management for NC blue crabs. |
| David ONeal Jr. | North Carolina | I am opposed to any new regulations on the blue crab fishery. |
| Penny Hooper | North Carolina | <p>Hooper Family Seafood at 273 East City Rd, Smyrna, NC , 28579, Has made a living for our our family of four for more than 50 years. Our clientele loves our soft shell crabs in the spring of the year. Please remember the Mom and Pop businesses like ours, that have worked these waters for many years and tried to keep Blue Crabs a vibrant industry in our state. Study the Science and listen to the people!</p> <p>thank you, Penny Hooper [REDACTED] [REDACTED]</p> |
| Thelma ONeal | North Carolina | I am against any new regulations on blue crabs. |
| Christophe Elkins | North Carolina | Move the 5 crab pot rule from the RCGL to the recreational license. |



North Carolina General Assembly
House of Representatives

REPRESENTATIVE EDWARD C. GOODWIN
1ST DISTRICT

Dear Director and members of the Commission,

11/17/25

Again, we are informed that the NCMFC is going to vote on another restriction on seafood in our waters. The Blue Crab industry is North Carolina's number one seafood industry, accounting for \$58 million in sales and over 1200 jobs, mostly in coastal Tier 1 counties. This will be devastating to many families and communities.

It has been my observation that many of these fishing restrictions, be it through proclamation or rule adoptions, often come with little or no current data. And whether by design or disregard, the outcome is always the same, detriment to North Carolina's seafood industry. Where is the current Blue Crab stock assessment that backs up this latest restriction? Sooner or later, the NCGA is going to take notice of these rules and proclamations, and I know my fellow legislators in the House are now very aware of how critical and vulnerable our seafood industry is and there are more of us who want to save it than want to end it.

Please do the right thing and delay this latest round of setbacks and wait until you have completed a current stock assessment before you issue a ruling that will deliver a crushing blow to an industry that is being restricted out of existence.

Representative Ed Goodwin

A handwritten signature in cursive script that reads "Ed Goodwin".

NC House District 1



Tyrrell County Board of Commissioners

Post Office Box 449
Columbia, North Carolina 27925
Telephone (252) 796-1371

Nathan T. Everett, Chairman
Jordan R. Davis, Vice Chairman
Nina B. Griswell
Robert Thompson
Darryl Liverman



David L. Clegg, County Manager and Attorney
Penny Rhodes Owens, Clerk to the Board

Resolution in Opposition of Proposed Blue Crab Harvest Restrictions

WHEREAS, in December 1998, a fishery management plan for blue crab was adopted and, since that time, three amendments and two revisions have been made to the plan; and

WHEREAS, a comprehensive external review of the North Carolina Blue Crab Management Plan was performed in 2023; and

WHEREAS, the most recent compiled biomass stock assessment was completed in 2018, and the North Carolina Division of Marine Fisheries (NCDMF) has advised that it is currently working on a new Blue Crab Stock Assessment, which is due in 2026; and

WHEREAS, biomass stock assessment of the blue crab was calculated by trawling, and blue crabs are caught more productively by pot fishery; and

WHEREAS, many of our crabbers have invited NCDMF biologists to ride along and observe the fishery as they are working it; however, the NCDMF has refused to entertain this concept of fishery management data collections; and

WHEREAS, the blue crab fishery is complex and involves a variety of factors, such as market fluctuations, weather, water conditions, toxicity, salinity, currents, tides and hypoxia-none of which are mentioned in the current report's observations from the NCDMF biologists; and

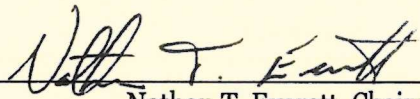
WHEREAS, trip ticket factors are pronounced in the adaptive management plan and show a parallel effect of less effort by the crabbers and the result of less landings of blue crab; and

WHEREAS, Tyrrell County is economically dependent on all aspects of aquaculture in the smallest labor market in the state where employment directly tangentially related to the harvesting and processing of crab employees nearly three hundred persons in full time employment; and

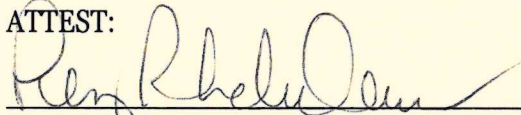
WHEREAS, all of the NCDMF advisory committees recommended status quo of the blue crab fishery with no further restrictions;

THEREFORE, BE IT RESOLVED, that the Tyrrell County Board of Commissioners strongly opposes any further restrictions to the blue crab fishery until the 2026 stock assessment is completed, and further, hereby endorses the position of the North Carolina Coastal Counties Fisheries Coalition on this issue.

This the 17th day of November, 2025.


Nathan T. Everett, Chairman

ATTEST:


Penny Rhodes Owens, Clerk to the Board



North Carolina Coastal Counties Fisheries Coalition

Robert L. "Bob" Woodard, Sr., Chairman
Chris Chadwick, Vice-Chairman

November 14, 2025

To the Members of the North Carolina Marine Fisheries Commission:

On behalf of the North Carolina Coastal Counties Fisheries Coalition, I am pleased to introduce our organization and share our commitment to the future of North Carolina's commercial fishing industry.

The Coastal Counties Fisheries Coalition represents 15 coastal counties that, together, form the backbone of our state's working waterfronts. Our coalition was established to provide a unified voice for the commercial fishermen, seafood dealers, processors, and coastal communities whose livelihoods depend on sustainable access to North Carolina's marine resources.

Our mission is clear:

"The North Carolina Coastal Counties Fisheries Coalition supports our state's commercial fishermen and fishing communities in an effort to protect their livelihoods, preserve coastal heritage, and safeguard the economic vitality of our working waterfronts. Together, we work to ensure the continued harvest of high-quality North Carolina seafood—feeding families, strengthening communities, and ensuring North Carolina Catch remains a priority for consumers to enjoy throughout our state and beyond."

Our purpose is to protect and advocate for commercial fishing in North Carolina, ensuring that the voices of those who work the water are heard in decisions that affect the industry and our coastal way of life.

We look forward to establishing a strong and productive relationship with the Commission and working together toward policies that balance sustainability with the continued viability of our commercial fisheries.

We welcome the opportunity to meet with the Commission to further discuss our goals and priorities.

Respectfully,

A handwritten signature in blue ink, reading "Robert L. Woodard, Sr.".

Robert L. "Bob" Woodard, Chairman
Coastal Counties Fisheries Coalition



North Carolina Coastal Counties Fisheries Coalition

Robert L. "Bob" Woodard, Sr., Chairman
Chris Chadwick, Vice-Chairman

Resolution of the North Carolina Coastal Counties Fisheries Coalition Opposing Proposed Restrictions on the Blue Crab Fishery

WHEREAS, the blue crab (*Callinectes sapidus*) fishery is one of North Carolina's most valuable and culturally significant coastal resources, contributing millions of dollars annually to the state's economy and supporting hundreds of commercial fishing operations, seafood processors, distributors, and working watermen across our coastal counties; and

WHEREAS, the blue crab fishery sustains the livelihoods of generations of commercial fishermen and seafood businesses, while preserving the maritime heritage and economic stability of coastal communities; and

WHEREAS, the Albemarle and Pamlico Sounds and their connected waterways represent some of the most productive blue crab habitats in the state and the USA, and that a significant portion of North Carolina's total blue crab harvest originates from these waters; and

WHEREAS, since the adoption of the Blue Crab Fishery Management Plan in 1998, three amendments and two revisions have been made, and a comprehensive external review of the plan was conducted in 2023; and

WHEREAS, the most recent accepted blue crab biomass stock assessment was completed in 2018, and the North Carolina Division of Marine Fisheries (NCDMF) has advised that a new stock assessment is currently underway and expected in 2026; and

WHEREAS, an updated stock assessment was conducted, found not to meet scientifically standards by scientific experts and the experts recommended a new benchmark assessment be completed before any additional regulatory changes were enacted; and

WHEREAS, the NCDMF does not know the population status of blue crabs; and

WHEREAS, recent scientifically published paper by Voigt et al., *Long-Term Trends in Juvenile Blue Crab Recruitment Patterns in a Wind-Driven System*, found that that there is no evidence that recruitment overfishing of blue crabs is occurring in NC, unlike what the DMF suspected and stated in Blue Crab FMP Amendment; and

WHEREAS, the blue crab fishery is complex and influenced by a variety of environmental and economic factors—such as weather, water quality, salinity, currents, tides, hypoxia, and market conditions—none of which are fully captured in current NCDMF trawl-and gill net based data collection methods; and

WHEREAS, many commercial crabbers have invited NCDMF biologists to observe pot fisheries firsthand in order to improve scientific understanding, but these offers have not been meaningfully incorporated into management decisions and the NCDMF terminated its fisheries dependent blue crab sampling programs; and

WHEREAS, the Division of Marine Fisheries has proposed new harvest restrictions, including hard crab landing limits of 30 bushels north of Highway 58 and 15 bushels south of Highway 58 from September through December, as well as a statewide prohibition on crab trawling; and

WHEREAS, these proposed measures would result in significant decreases in landings compared to 2019–2023 averages, leading to substantial economic losses for watermen, seafood processors, and the broader coastal economy; and

WHEREAS, the North Carolina Sea Grant has reported that the state's wild and farmed shellfish industries contributed approximately \$31.7 million to the state economy in 2022, demonstrating the importance of maintaining a balanced and sustainable approach to fisheries management; and

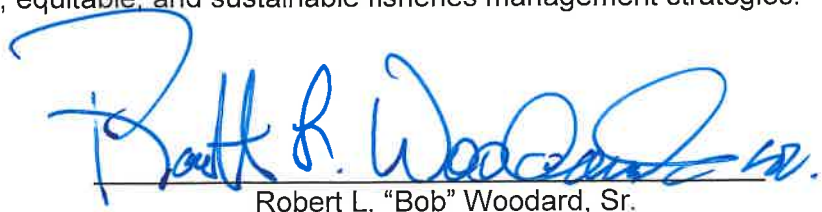
WHEREAS, recent data indicate that blue crab landings remain stable in recent years and that fishing effort has declined and all of the NCDMF advisory committees have recommended maintaining the current ("status quo") management measures until the completion of the 2026 assessment; and

WHEREAS, premature or overly restrictive regulations risk inflicting unnecessary economic harm on commercial crabbers, seafood businesses, and coastal communities without sufficient scientific justification.

NOW, THEREFORE, BE IT RESOLVED by the North Carolina Coastal Counties Fisheries Coalition, that:

1. The Coalition formally opposes the adoption of any new blue crab harvest restrictions prior to the completion of the 2026 Blue Crab Stock Assessment.
2. The Coalition urges the North Carolina Marine Fisheries Commission and the Division of Marine Fisheries to base all future regulatory actions on transparent, peer-reviewed science and to include comprehensive economic impact assessments and full stakeholder consultation.
3. The Coalition calls on state officials to adopt a more inclusive and field-informed data collection process that reflects real-world fishing conditions, including direct observation opportunities with working watermen.
4. The Coalition supports balanced management solutions that ensure the long-term sustainability of the blue crab population while protecting the economic and cultural heritage of North Carolina's coastal communities.
5. The Coalition stands ready to collaborate with state agencies, research institutions, and stakeholders to develop data-driven, equitable, and sustainable fisheries management strategies.

This the 5th day of November, 2025



Robert L. "Bob" Woodard, Sr.

North Carolina Coastal Counties Fisheries Coalition, Chairman

Attest:



Skyler Foley, Clerk



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OFFICE

Steven W. Troxler
Commissioner

November 10, 2025

The N.C. Department of Agriculture and Consumer Services appreciates the opportunity to comment on the Blue Crab Fishery Management Plan (FMP) Amendment 3 Adaptive Management Revision.

After review, the Department opposes additional reductions in commercial blue crab harvest and urges that any management action be based on verified, peer-reviewed science and a full assessment of economic impacts.

The 2023 stock assessment update introduced significant changes in reference points and was not recommended for management use by the Division or external reviewers, who advised that a new benchmark assessment be completed before any regulatory changes. Acting now would be scientifically premature and inconsistent with the "best available science" standard in G.S. § 143B-289.52.

The blue crab fishery remains North Carolina's most valuable commercial fishery, accounting for 31 percent of total ex-vessel value and over \$58 million in statewide sales impact in 2023. It supports more than 1,200 jobs and hundreds of small, family-owned operations in Tier 1 economically distressed coastal counties.

Reducing harvest will place additional strain on seafood dealers, processors, distributors and restaurants, leading to the loss of local jobs, diminished business activity, and greater reliance on imported swimming crab. Our experience shows that once lost, these supply chains and consumer relationships are nearly impossible to reclaim.

Seafood is both a major food source and a cornerstone of North Carolina's coastal economy. Policies that restrict access to domestic seafood increase dependence on imports, heighten national food-security risks, and create potential food-safety vulnerabilities.

North Carolina has already implemented robust conservation measures under Amendment 3 (2020), including female size limits, harvest prohibitions, seasonal closures, and cull tolerances, achieving the 2.4 percent harvest reduction required by statute. These measures should be fully evaluated over the rebuilding period before imposing further cuts.

NCDA&CS recommends that the Division of Marine Fisheries and the Marine Fisheries Commission delay new harvest reductions until completion of a new benchmark stock assessment, conduct a comprehensive socioeconomic analysis of proposed actions, and work with coastal stakeholders to advance habitat and water-quality initiatives that sustain both the resource and the industry it supports.

Thank you for considering these comments. NCDA&CS remains committed to protecting coastal resources and ensuring North Carolina seafood retains its strength and visibility in the market.

Sincerely,

Commissioner Steve Troxler
N.C. Dept. of Agriculture & Consumer Services



25-11-53

Resolution in Opposition of Proposed Blue Crab Harvest Restrictions

WHEREAS, in December 1998, a fishery management plan for blue crab was adopted and, since that time, three amendments and two revisions have been made to the plan; and

WHEREAS, a comprehensive external review of the North Carolina Blue Crab Management Plan was performed in 2023; and

WHEREAS, the most recent compiled biomass stock assessment was completed in 2018, and the North Carolina Division of Marine Fisheries (NCDMF) has advised that it is currently working on a new Blue Crab Stock Assessment, which is due in 2026; and

WHEREAS, biomass stock assessment of the blue crab was calculated by trawling, and blue crabs are caught more productively by pot fishery; and

WHEREAS, many of our crabbers have invited NCDMF biologists to ride along and observe the fishery as they are working it; however, the NCDMF has refused to entertain this concept of fishery management data collections; and

WHEREAS, the blue crab fishery is complex and involves a variety of factors, such as market fluctuations, weather, water conditions, toxicity, salinity, currents, tides and hypoxia—none of which are mentioned in the current report's observations from the NCDMF biologists; and

WHEREAS, trip ticket factors are pronounced in the adaptive management plan and show a parallel effect of less effort by the crabbers and the result of less landings of blue crab; and

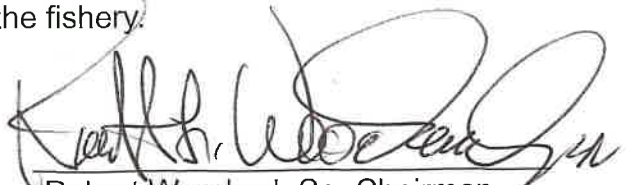
WHEREAS, a proposed 5-month closure of the fishery and/or a 10-bushel limit would have surmountable economic impact across the fishery, affecting our local communities; and

WHEREAS, all of the NCDMF advisory committees recommended status quo of the blue crab fishery with no further restrictions;

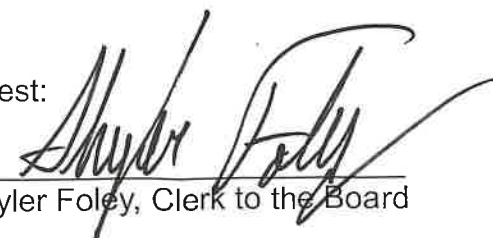
THEREFORE, BE IT RESOLVED, that the Dare County Board of Commissioners strongly opposes any further restrictions to the blue crab fishery until the 2026 stock assessment is completed, as well as a new comprehensive plan for collecting data of the fishery.

This the 3rd day of November 2025.




Robert Woodard, Sr., Chairman

Attest:


Skyler Foley, Clerk to the Board



RESOLUTION 2025-026

RESOLUTION IN SUPPORT OF THE NORTH CAROLINA COASTAL COUNTIES FISHERIES COALITION POSITION (Regarding Proposed Blue Crab Harvest Limit Changes)

WHEREAS, the coastal counties of North Carolina depend heavily on a balanced, sustainable, and well-managed commercial and recreational fishing industry that supports local economies, working families, and our state's cultural heritage; and

WHEREAS, the North Carolina Division of Marine Fisheries (DMF) and Marine Fisheries Commission (MFC) have announced their intent to consider new restrictions on blue crab harvest limits under Blue Crab Fishery Management Plan Amendment 3 during their November 2025 meeting; and

WHEREAS, according to information presented during the September 16, 2025 Coastal Counties Fisheries Coalition meeting, no scientific or biological evidence of a decline in the blue crab population was presented as justification for these new restrictions; and

WHEREAS, meeting transcripts reflect that crab harvest levels have remained consistent despite fewer fishermen participating, and that local watermen and independent observers have reported stable or increasing crab populations, indicating that there is no verified biological basis for reducing current harvest limits; and

WHEREAS, the 2025 peer-reviewed study by Lee & Kwak, published in Fisheries Oceanography, concluded that long-term changes in marine species composition are driven primarily by environmental variables such as temperature and salinity, not fishing pressure; and

WHEREAS, former NCDMF Chief of Fisheries Management Jess Hawkins, a thirty-year veteran fisheries scientist, has likewise stated publicly that shrimp and crab population fluctuations in North Carolina are predominantly environmentally and habitat driven, and that management changes should therefore be grounded in environmental monitoring and science-based data rather than arbitrary regulation; and

WHEREAS, the North Carolina Coastal Counties Fisheries Coalition (NCCFC), representing local governments and stakeholders from across the state's coastal region, has adopted a formal position urging the MFC and DMF to delay implementation of any new crab harvest limits until more region-specific, scientifically validated research is completed; and

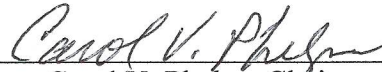
WHEREAS, premature restrictions imposed without sound scientific justification would have significant negative impacts on local fishermen, seafood markets, and rural coastal economies without providing measurable ecological benefit;

NOW, THEREFORE, BE IT RESOLVED, that the Washington County Board of Commissioners hereby expresses its full support for the North Carolina Coastal Counties Fisheries Coalition's position regarding the proposed blue crab harvest limit changes and formally urges the North Carolina Marine Fisheries Commission to:

1. Refrain from adopting new blue crab limit reductions at this time;
2. Base future management decisions on validated scientific evidence of stock decline or ecosystem stress;
3. Enhance environmental and habitat monitoring programs to ensure that future regulatory actions reflect actual conditions; and
4. Engage with coastal counties, industry representatives, and academic institutions before implementing any additional harvest restrictions.

BE IT FURTHER RESOLVED, that a copy of this resolution shall be forwarded to the North Carolina Marine Fisheries Commission, the Division of Marine Fisheries, the North Carolina Department of Environmental Quality, and the North Carolina Coastal Counties Fisheries Coalition for inclusion in the official record of public comment on Blue Crab Fishery Management Plan Amendment 3.

ADOPTED this 3rd day of November 2025, by the Washington County Board of Commissioners.



Carol V. Phelps, Chair

Washington County Board of Commissioner

ATTEST:



Julie J. Bennett, MMC, NCMCC
Clerk to the Board





COUNTY OF CURRITUCK

Resolution of the Board of Commissioners Opposing the Division of Marine Fisheries' Proposed Limits on Landings of Blue Crabs

Whereas, Currituck County relies on the commercial fishing industry to provide jobs and promote local spending, both of which contribute to the health of Currituck County's economy; and

Whereas, Blue Crab is considered one of the largest and most valuable fisheries in North Carolina and is the number one species harvested in both Currituck Sound and Albemarle Sound; and

Whereas, the Division of Marine Fisheries has recommended landing limits of 30-bushels of hard crab North of HWY 58 bridge and 15-bushels of hard crab South of Hwy 58 bridge from September-December, while prohibiting crab trawling statewide and keeping all other blue crab management measures in place; and

Whereas, the proposed regulations would result in a significant decrease in landings as measured by 2019-2023 averages, detrimentally impacting the livelihoods of our local watermen and the economy of Currituck County and neighboring counties that rely on the fishing industry; and

Whereas, the North Carolina Sea Grant found that North Carolina's wild and farmed shellfish industry contributed \$31.7 million to the state's economy in 2022 alone; and

Whereas, these proposed regulations would irreparably harm the state's seafood industry and ultimately, Northeastern North Carolina's overall economy.

Now, Therefore, Be It Resolved that the Currituck County Board of Commissioners hereby opposes the proposed regulations by the Division of Marine Fisheries, as these regulations would have severe negative impacts on the livelihoods of local watermen and on the economies of Currituck County and our neighboring communities that depend on the commercial fishing industry.

Be it Further Resolved that the Board of Commissioners will forward this Resolution to Currituck County's representatives in the North Carolina General Assembly and the North Carolina Marine Fisheries Commission and encourages the public to stand with the working watermen and voice their opposition to these proposed changes.

Adopted this 3rd day of November, 2025.

S. Paul O'Neal, Chairman

ATTEST:

Leeann Walton, Clerk to the Board