



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

STEPHEN W. MURPHEY
Director

June 6, 2019

MEMORANDUM

TO: N.C. Marine Fisheries Commission

FROM: Michael S. Loeffler and Anne L. Markwith, Southern Flounder Fishery Management Plan Co-Leads

SUBJECT: Southern Flounder Fishery Management Plan Amendment 2

Issue

The draft Southern Flounder Fishery Management Plan (FMP) Amendment 2 containing the Department of Environmental Quality, Division of Marine Fisheries, FMP Advisory Committee, and Finfish, Northern, and Central Advisory Committee positions is ready to be presented to the N.C. MFC for their consideration. In addition, public comment received from May 23, 2019 through June 3, 2019 are included in a summarized format. The division and advisory committees have developed management measures for the commission's consideration to meet statutory requirements to achieve a sustainable harvest* in the southern flounder fishery, to end overfishing by 2021 and rebuild the spawning stock biomass* (SSB) by 2028.

Findings

- The most recent coast-wide stock assessment determined the stock* is overfished* and overfishing* is occurring.
- Reductions in **total coast-wide removals*** are necessary to end overfishing within two years and recover the stock from an overfished state within a 10-year period.
- To reach the fishing mortality* (*F*) threshold* and end overfishing, a 31% reduction in total coast-wide removals is necessary, while a 51% reduction is necessary to reach the fishing mortality target*. Neither of these levels of reduction would rebuild the spawning stock biomass (SSB) by 2028.
- For the SSB to reach the threshold by 2028 and end the overfished status a 52% reduction in total coast-wide removals will be required. To reach the SSB target by 2028 a 72% reduction in total coast-wide removals will be required.
- Static quota, dynamic quota, slot limits, changes in the size limit, and gear changes related to size limit changes are not considered feasible options to address sustainable harvest in draft Amendment 2 due to the accelerated timeline and the need to implement management measures before the fall 2019 fishing season.

Action Needed

At their June 6, 2019 meeting, the MFC is scheduled to receive a presentation summarizing public comment, to select their preferred management strategies, and to vote for Draft Amendment 2 to be sent to the department secretary for review.

Overview

Southern flounder is a commercially and recreationally important fishery currently managed under Amendment 1 and Supplement A to Amendment 1, as modified by the Aug. 17, 2017 settlement agreement, of the N.C. Southern Flounder FMP.

Amendment 2 Goal and Objectives

The goal and objectives for draft Amendment 2 to the N.C. Southern Flounder FMP were reviewed and approved by the commission at its May 17, 2019 meeting. The goal and objectives for the FMP are:

Goal

Manage the southern flounder fishery to achieve a self-sustaining population that provides sustainable harvest using science-based decision-making processes. The following objectives will be used to achieve this goal.

Objectives

1. Implement management strategies within North Carolina and encourage interjurisdictional management strategies that maintain/restore the southern flounder spawning stock with multiple cohorts and adequate abundance to prevent recruitment overfishing.
2. Restore, enhance, and protect habitat and environmental quality necessary to maintain or increase growth, survival, and reproduction of the southern flounder population.
3. Use biological, environmental, habitat, fishery, social, and economic data needed to effectively monitor and manage the southern flounder fishery and its ecosystem impacts.
4. Promote stewardship of the resource through increased public awareness and interjurisdictional cooperation throughout the species range regarding the status and management of the southern flounder fishery, including practices that minimize bycatch and discard mortality.

Stock Assessment

Southern flounder is assessed as a single biological unit stock occurring from North Carolina through the east coast of Florida. Based on life history information, a multi-state cooperative group performed a stock assessment with a terminal year* of 2017 that determined the stock is overfished and overfishing is occurring.

- The stock assessment estimated biological reference points of $F_{35\%}$ (fishing mortality target) as 0.35 and $F_{25\%}$ (fishing mortality threshold) as 0.53. Estimated F in the terminal year of 2017 is 0.91, which is higher than the threshold and indicates overfishing is occurring.
- The stock assessment estimated an SSB target of 5,452 metric tons (approximately 12.0 million pounds) and threshold of 3,900 metric tons (approximately 8.6 million pounds). Estimated SSB in the terminal year of 2017 is 1,031 metric tons (approximately 2.3 million pounds), which is lower than the threshold and indicates the stock is overfished.

Statutory Requirements

North Carolina General Statute 113-182.1 mandates that fishery management plans shall: 1) specify a time period not to exceed two years from the date of adoption of the plan to end overfishing, 2) specify a time period not to exceed 10 years from the date of adoption of the plan for achieving a sustainable harvest, and 3) must also include a standard of at least 50% probability of achieving sustainable harvest for the fishery. Sustainable harvest is defined in North Carolina General Statute

113-129 as “the amount of fish that can be taken from a fishery on a continuing basis without reducing the stock biomass of the fishery or causing the fishery to become overfished.”

In accordance with North Carolina General Statute 143B-289.52(e1) a supermajority of the Commission shall be six members. A supermajority shall be necessary to override recommendations from the Division of Marine Fisheries regarding measures needed to end overfishing or to rebuild overfished stocks.

Projections

To meet statutory requirements, calculations were made to determine reductions in total coast-wide removals necessary to end overfishing within the two-year period and recover the stock from an overfished state within the 10-year period. These projections estimate necessary changes to F when compared to the 2017 terminal year fishing mortality estimates identified in the stock assessment. In addition, the projections assumed management would start in 2019 and so the 10-year rebuilding period would need to be met by 2028.

Projections assume all four states implement measures for the reductions required to rebuild SSB. In addition, projections detailing changes in SSB assume the shrimp trawl fleet removals will continue in all scenarios. However, the partial moratorium projection also assumes no removals from the commercial or recreational fisheries, whereas less restrictive scenarios account for the specified volume of removals including harvest and dead discards. These projections provide a mathematically optimistic rebuilding schedule for SSB and are unlikely to be fully achieved given the disparity of regulating commercial and recreational gear removals and without comparable management action from the other southeastern states. For further information on the interjurisdictional nature of this species, please see the *Interjurisdictional Management* sub-section found in Section VI, Management Strategies for Sustainable Harvest of Draft Amendment 2.

To reach the fishing mortality threshold and end overfishing, a 31% reduction in total removals is necessary, while a 51% reduction is necessary to reach the fishing mortality target. However, while both of these reductions are sufficient to end overfishing in two years, neither are sufficient to achieve a sustainable harvest and end the overfished status within the 10-year period.

To reach the SSB threshold and end the overfished status by 2028, as is statutorily required, a fishing mortality of 0.34 achieved via a 52% reduction in total removals is needed. To reach the SSB target by 2028, fishing mortality would need to be lowered to 0.18 by reducing total removals by 72%. All projections are associated with at least a 50% probability of success. Both scenarios for rebuilding SSB meet the requirement to end overfishing in two years.

The projections are based on coast-wide reductions (North Carolina to Florida) necessary for coast-wide rebuilding. However, in developing necessary management measures, the division has applied the reductions for total removals only to North Carolina's portion. To do this, the percent reduction was applied to the total removals for North Carolina from the 2017 terminal year of the assessment. In North Carolina, the commercial fishery accounted for 71.8% of the total removals in pounds while the recreational fishery total removals (from hook-and-line and gigs) accounted for 28.2% in 2017. In addition, commercial removals that occurred through means of “other gears,” those non-targeted flounder gear such as fyke nets, crab pots, and trawls are subtracted from the total removals prior to analysis. The impacts from these other gears are approximately 0.6% of the overall removals. While draft Amendment 2 will not impact other states' removals, continued cooperation

among the state agencies involved with the stock assessment and their willingness to enact management measures to rebuild the stock within their jurisdictional boundaries is of the utmost importance for the stock.

Proposed Management Options

The list of proposed management options, including the positives and negatives for each option, can be found in Section VII, Proposed Management Options of draft Amendment 2. Department and Division recommendations are in ***bolded italicized*** font below, and additional information on these recommendations, can be found in Section VIII, Recommendations of Draft Amendment 2. The FMP advisory committee recommendations are summarized below and found in Section VIII, Recommendations of Draft Amendment 2.

The Department and the Division recognize that these reductions are significant but necessary to increase the probability of successfully rebuilding this important recreational and commercial resource.

Commercial Fishery Options

- A. Establish seasonal closures by area for the commercial fishery to reduce F to the fishing mortality threshold (31% reduction)
- B. Establish seasonal closures by area for the commercial fishery to reduce F and allow the SSB to rebuild to the threshold (52% reduction)
- C. Establish seasonal closures by area for the commercial fishery to increase SSB between the threshold and target (62% reduction)
- D. Establish seasonal closures by area for the commercial fishery to reduce F and allow the SSB to rebuild to the target (72% reduction)
- E. Establish a partial moratorium for the commercial fishery

Establish seasonal closures by area for the commercial fishery to reduce F and increase SSB to rebuild between the threshold and the target in 2019 (Option C, 62% reduction) and establish seasonal closures by area for the commercial fishery to reduce F and allow the SSB to rebuild to the target in 2020 (Option D, 72% reduction).

Recreational Fishery Options

- A. Establish a season for the recreational fishery to reduce F to the fishing mortality threshold (31% reduction)
- B. Establish a season for the recreational fishery to reduce F and allow the SSB to rebuild to the threshold (52% reduction)
- C. Establish seasonal closures by area for the recreational fishery to increase SSB between the threshold and target (62% reduction)
- D. Establish a season for the recreational fishery to reduce F and allow the SSB to rebuild to the target (72% reduction)
- E. Establish a partial moratorium for the recreational fishery

Establish seasonal closures by area for the recreational fishery to reduce F and increase SSB to rebuild between the threshold and the target in 2019 (Option C, 62% reduction) and establish seasonal closures by area for the recreational fishery to reduce F and allow the SSB to rebuild to the target in 2020 (Option D, 72% reduction).

Additional Management Options: Non - Quantifiable Harvest Restrictions

These options can be implemented in conjunction with seasons to minimize the potential for overages in total removals by mitigating probable effort changes due to shortened seasons.

- A. Trip Limits
 - i. Limiting numbers per trip for the commercial gig fishery
 - ii. Limiting pounds per trip for the commercial pound net fishery
- B. Limiting days per week allowed in the Neuse River, Tar/Pamlico River and the Albemarle Sound areas that have previously been exempt from set restrictions
- C. Reducing fishing times allowed in the Neuse River, Tar/Pamlico River and the Albemarle Sound areas that have previously been exempt from time restrictions
- D. Gear Modifications
 - i. Prohibit the use of picks when harvesting fish from pound nets
 - ii. Reducing the maximum yardage allowed in the large mesh gill net fishery

The NCDMF recommendation includes: Reducing commercial anchored large-mesh gill net soak times to single overnight soaks where nets may be set no sooner than one hour before sunset and must be retrieved no later than one hour after sunrise the next morning in the Neuse, Tar/Pamlico rivers and the Albemarle Sound areas that have previously been exempt; reducing the maximum yardage allowed in the commercial anchored large-mesh gill net fishery by 25% for each Management Unit; by allowing a maximum of 1,500-yards in Management Units A, B, and C, and a maximum of 750-yards in Management Units D and E unless more restrictive yardage is specified through adaptive management through the sea turtle or sturgeon Incidental Take Permits (ITP); and prohibiting the use any method of retrieving live flounder from pound nets that cause injury to released fish (no picks, gigs, spears, etc.).

Management measures from Amendment 1 and Supplement A to Amendment 1 will be incorporated into Amendment 2 (see Section VIII, Recommendations in Draft Amendment 2). Additionally, the recreational bag limit of no more than four flounder is maintained in Amendment 2. This bag limit is required through the N.C. FMP for Interjurisdictional Fisheries to maintain compliance with the Atlantic States Marine Fisheries Commission Summer Flounder, Scup, and Black Sea Bass FMP Addendum XXVIII. The December commercial closure period from Amendment 1 would no longer be in effect, as it is encompassed by the seasonal closure periods implemented by the adoption of Amendment 2.

The NCDMF recommendation includes that the adoption of Amendment 2 authorizes continued development of Amendment 3 and more robust management strategies. Amendment 3 will be completed as quickly as possible with the ongoing contributions of the Southern Flounder FMP Advisory Committee members. This will best serve to assist the division in development of Amendment 3, by building on the knowledge, expertise, and cooperation already underway and continue the work uninterrupted from meetings that began in January 2018.

Southern Flounder FMP Advisory Committee Recommendation

At the June 3, 2019 Southern Flounder FMP Advisory Committee meeting, the following recommendation was approved by the committee for the 2019 and 2020 fishing year and forward. For further information, including proposed seasons, see Section VIII, Recommendations of Draft Amendment 2. The committee voted to establish a season for the commercial and recreational fisheries to reduce *F* and allow the SSB to rebuild to the threshold in 2019 (Option B, 52% reduction) with the following additional modifications.

FMP AC Management Option for 2020 and forward

Starting Jan. 1, 2019 adopt a recommendation for a 52% reduction for the commercial and recreational fisheries with the following changes for the commercial fishery, calculated by the

northern, central, and southern areas proposed by the division:

- Commercial pound net fishery, 40% reduction
- Commercial gig fishery, 40% reduction
- Commercial large-mesh gill net fishery, a reduction of approximately 71% would be needed to make up the difference to yield a 52% reduction for the commercial fishery overall. The AC recognizes that the division proposal for the Recreational Commercial Gear License large mesh gill net season of Sept. 15-Sept. 30 may be changed by this final percent reduction.

The committee recommendation also includes that management measures from Amendment 1 and Supplement A to Amendment 1, as stated above in the NCDMF recommendation, be carried forward. The recommendation also maintains regulations from the ASMFC Summer Flounder, Black Sea Bass, and Scup Addendum XXVIII for recreational size and bag limit for flounder and approves the continued development of Amendment 3.

In addition, the committee recommends prohibiting the use of picks, gaffs, gigs, and spears when removing flounder from pound nets. As of Jan. 1, 2020, the committee also recommends implementing a 1,500-yard limit for large mesh gill nets in Management Unit A, a 1,000-yard limit for large mesh gill nets in Management Units B and C, and a 750-yard limit for large mesh gill nets in Management Units D and E.

Finally, the committee recommends a 52% reduction be applied to the recreational fisheries. The season for the recreational hook-and-line and gig fisheries will be July 16 through Sept. 30.

Southern Advisory Committee Recommendation

The Southern Advisory Committee met on June 3, 2019 and failed to reach consensus on a recommendation for draft Amendment 2.

Northern Advisory Committee Recommendation

The Northern Advisory Committee met on June 3, 2019 and passed a motion supporting the NCDMF recommendation of the 62% reduction in 2019 and 72% percent reduction from 2020 forward to include management carried forward from Amendment 1 and Supplement A to Amendment 1, maintaining the size and bag limits established by the ASMFC Summer Flounder, Black Sea Bass, and Scup Addendum XXVIII, and the continued development of Amendment 3. In addition, the Northern AC passed a motion asking the MFC to consider dividing the allowable days for gill netting amongst allowable fishing months for a given area due to the Sea Turtle ITP.

Finfish Advisory Committee Recommendation

The Finfish Advisory Committee met on June 3, 2019 and recommended a reduced harvest of 52%, not to exceed 52%, until Amendment 3 is completed. This recommendation includes

management carried forward from Amendment 1 and Supplement A to Amendment 1, maintaining the size and bag limits established by the ASMFC Summer Flounder, Black Sea Bass, and Scup Addendum XXVIII, and the continued development of Amendment 3. The committee also recommended that the MFC ask the Secretary of DEQ to allow the Director of

DMF to go out of compliance with ASMFC Summer Flounder Plan and adopt a 12-inch size limit and a 4-fish bag limit for southern flounder in North Carolina waters. The committee also requested the Southern Flounder AC look at a moratorium on all southern flounder harvest from Nov. 1, 2019 to Sept. 1, 2022.

Summary of Public Comment

Public comments were accepted through three formats: mail, online, and at the joint advisory committee meeting. This meeting was held on June 3, 2019 and allowed for a maximum of 90 minutes of public comment. Mail and online comments were collected from May 23 through June 3, 2019 at midnight. Eleven comments were received through the mail, all (100%) were opposed to draft Amendment 2. Two hundred and forty-one responses were received through online tools, 91 in favor and 150 opposed to draft Amendment 2. Of those that indicated support for draft Amendment 2 the most indicated option for 2019 and 2020 was for Option C (62% reduction) in 2019 (38% of responses), Option D (72% reduction) in 2020 (44% of responses). In addition, trip limits, fishing times, and gear changes received more responses than the no preference option for the additional non-quantifiable management measures (Table 1). Thirteen comments were received during the public comment period at the joint advisory committee meeting, three (23%) were in favor of and 10 (77%) were opposed to draft Amendment 2. All public comments can be found in Appendices 1-3.

Timeline

June 6, 2019

At the Marine Fisheries Commission special meeting the division will detail advisory committee and public input and the commission will vote to select its preferred management strategy and vote to send a revised draft Amendment 2 to the Department of Environmental Quality secretary for review and comment. The secretary has 30 days to review and will forward to the appropriate legislative committees.

August 2019

The commission will receive any departmental and legislative input provided. The commission is scheduled to vote on final approval of Amendment 2. If approved, management measures will be implemented via the proclamation authority of the division director following the meeting.

*Definitions

Sustainable Harvest – The amount of fish (in weight) that can be taken from a stock at a given fishing intensity and the stock biomass does not change year to year.

Spawning Stock Biomass – Total weight of mature females in the stock.

Stock – A group of fish of the same species in a given area. Unlike a fish population, a stock is defined as much by management concerns (jurisdictional boundaries or harvesting locations) as by biology.

Overfished – State of a fish stock that occurs when a stock size falls below a specific threshold.

Overfishing – Occurs when the rate that fish that are harvested or killed exceeds a specific threshold.

Total removals – In the commercial fishery, the sum of the landings and dead discards; in the recreational fishery, the sum of the observed harvest and dead discards.

Fishing Mortality (F) – Rate at which southern flounder are removed from the population due to fishing.

Threshold – The maximum values of fishing mortality or minimum values of the biomass, which must not be exceeded. Otherwise, it is considered that it might endanger the capacity of self-renewal of the stock.

Target – The level of fishing mortality or of the biomass, which permit a long-term sustainable exploitation of the stock, with the best possible catch.

Terminal Year – The final year of estimates being used in an analysis.

Table 1. Summary of responses from public comment on southern flounder draft Amendment 2.

Issue	Method of Public Comment Received			
	Mail	Online	Public Comment*	
	Response (number; %)	Response (number; %)	Response (number; %)	
Do you support Draft Amendment 2	Yes	0 (0%)	91 (38%)	3 (23%)
	No	11 (100%)	150 (62%)	10 (77%)
	Total	11 (100%)	241 (100%)	13 (100%)
If you support Draft Amendment 2 which option do you recommend for 2019?	Option A (31%)		8 (9%)	
	Option B (52%)		9 (10%)	
	Option C (62%)		34 (38%)	
	Option D (72%)		11 (12%)	
	Option E (Partial Moratorium)		20 (22%)	
	No Preference		7 (8%)	
	Total		89	
If you support Draft Amendment 2 which option do you recommend beginning in 2020?	Option A (31%)	N/A	N/A	N/A
	Option B (52%)		14 (16%)	
	Option C (62%)		10 (11%)	
	Option D (72%)		39 (44%)	
	Option E (Partial Moratorium)		19 (22%)	
	No Preference		6 (7%)	
	Total		88	
Do you support additional non-quantifiable measures?	Trip Limits		59 (31%)	
	Fishing Times		50 (26%)	
	Gear Changes		74 (38%)	
	None		5 (3%)	
	No Preference		5 (3%)	
	Total		193	

FOOTNOTES

3 instances of two entries with the same first and last name

1 instance of two entries with very similar language and almost identical first and last name

3 instances of fake first and last name

6 instances of entries indicating support of amendment 2 but did not pick any options



Ocracoke Civic & Business Association, Inc.

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May 27, 2019

North Carolina Division of Marine Fisheries:

The Ocracoke Civic & Business Association, Inc. (OCBA) wishes to go on record in support of the Ocracoke Seafood Company, ("The Fish House"), which is against the proposed Amendment 2, further restricting Southern Flounder fishing.

This proposal would severely reduce flounder landings, commercial and recreational, on Ocracoke Island and other rural areas in coastal North Carolina. Fresh, wild-caught seafood is one of the top tourist attractions on Ocracoke, adding to the \$1 billion of tourist revenues North Carolina gains yearly from the coastal region. In fact, 20% of all tourists visit the coast especially to eat locally caught seafood.

Ocracoke Seafood Company is a community-based business where commercial fishermen bring their catch and where the public can purchase fresh, wild-caught North Carolina seafood. Having this market on the island adds to Ocracoke's "Fishing Village" image, that benefits every business on Ocracoke.

All Ocracoke restaurants have contracts with local commercial fishermen to supply them with fresh fish. Flounder is one of the most prized fishes on our island tables. From September through November, Southern Flounder is our most important wholesale product.

The restrictions proposed in Amendment 2 would negatively impact the commercial fishermen's ability to catch Southern Flounder. Seasonal closures with a 62% reduction in landings would put the pound net fishermen out of business. The impact trickles down to lost jobs, decreased revenues, and ultimately, reduced state tax revenues.

Ocracoke Village would not be the same without the "Fish House". The enacting of this amendment would negatively affect all businesses on Ocracoke Island and would put Ocracoke Seafood Company in jeopardy of closing. This is unacceptable to Ocracoke.



Ocracoke Civic & Business Association, Inc.

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We urge the Division of Marine Fisheries and State Government to propose measures that will produce long-term benefits to the Southern Flounder stocks, but recognize that coastal communities and businesses need to stay economically viable.

We encourage the DMF to adopt a measured approach to any reductions, commercial or recreational, in the Southern Flounder harvest. The negative effect of drastic reductions will be felt by all businesses that service the tourist industry and commercial fishing.

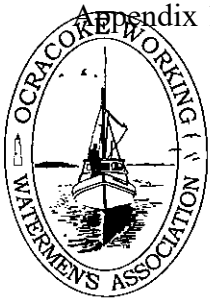
Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rudy Austin", is written over the typed name.

Rudy Austin, President

Ocracoke Civic & Business Association, Inc.



Appendix 1. Public Comment Received Through The Mail.

May 27, 2019

To: NCDMF and NCMFC regarding Amendment 2 of Southern Flounder FMP

Subject: Public comment against Amendment 2 of Southern Flounder FMP

The Ocracoke Working Watermen's Association (OWWA) would like to submit public comment stating it is against Amendment 2, NCDMF's recommendation for a 62% reduction in southern flounder harvest in 2019 and a 72% reduction in 2020. Implementing this level of reduction in 2019 will not allow any transition time for fishermen who harvest flounder time to evolve their fishing businesses. Furthermore, Ocracoke pound net fishermen will not have a chance to recover costs to set their pound nets with a Oct. 17th closure due to late season hurricanes and late summer warm water conditions that now extend into middle Oct. The NCDMF's recommendation allows early season fisheries, like river gillnet fishery, time to operate but allows no season for pound net fishermen in Ocracoke and Hatteras. Very unfair to all pound net fishermen who live in the Central region on east side of the Pamlico Sound.

Ocracoke fishermen support the extensive work and input the Southern Flounder AC has provided the NCDMF and their recommendation for a 31% reduction in 2019 and a 52% reduction in 2020. This recommendation stops overfishing in 2 years and provides fishermen a window to evaluate their businesses, opportunity to use up supplies already purchased and make adjustments. We believe the attrition rate of fishermen after 2019 will be so significant that the reduction in harvest in 2020 will likely exceed 52%. Because of the attrition, the rebuilding of the stock has a much greater chance to rebuild in the 10-year timeframe than what is being modeled by the NCDMF and escapement will be higher than predicted.

Ocracoke fishermen have transitioned from the large mesh gillnet fishery to primarily a fall pound net fishery. A significant portion of the income received from pound nets is recycled directly back into the Ocracoke economy. Employment in the winter is almost nonexistent so fall fishing income is critical to families being able to pay taxes, buy food, make repairs to gear and pay for health care. The NCDMF recommendation will cause havoc to the Ocracoke economy. The Southern Flounder AC recommendation will not solve all the issues that cutbacks are going to cause but will allow one season for Ocracoke's fishermen to adjust their business models and family budgets.

Pound nets are the keystone gear that provides fish for the fall tourist season on Ocracoke. Every restaurant on Ocracoke has a local fishermen dealer who supplies them with fish by harvesting not only flounder but sheepshead and black drum. By forcing pound nets out of the water on Oct. 17th, access to fall species will be virtually nonexistent and will have a devastating impact on Ocracoke Seafood Company's retail and wholesale businesses, Ocracoke's tourism revenue and Hyde County's sales tax revenue.

OWWA encourages the NCDMF and NCMFC to propose measures that will produce long-term benefits to the Southern Flounder stock, but recognize that coastal communities and businesses need to stay economically viable.

Thank you,

Hardy Plyler

Hardy Plyler
Vince O'Neal
Bill Evans
Farris O'Neal
David Hilton
Ernest Dosier
Erick O'Neal
Rex O'Neal
James B. Gaskill
Morty Gaskill
Wade Austin
Steve Wilson
Jesse Spencer
Danny Worsley
Andy O'Neal
John Ferrara
Jerry Lukefahr
Gene Ballance
Fletcher O'Neal
David O'Neal
Lewis O'Neal
Earl Gaskins
Kenneth Tillet
John Paul
Monroe Gaskill
Robbie Lewis
Arlene Burleigh
Jimmy O'Neal
Ikey O'Neal
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Albert O'Neal
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Appendix 1. Public Comment Received Through The Mail.

Marine Fisheries Advisory Board

Jonathan Robinson, Chairman

John T. Salter

Jess Hawkins

William Rice

Allyn B. Powell

Bradley Styron

Leslie "Sonny" Davis

Keith Mason

Ron McPherson

Thomas Carl McArthur, Jr.

Dean Smith



May 29, 2019

The Honorable Governor Roy Cooper
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Cooper:

The Carteret County Marine Fisheries Advisory Board ("CCMFAB") objects to the proposed Amendment 2 of the Southern Flounder Fishery Management Plan ("FMP"). They recommend that the MFC Advisory Committees, Secretary of the Department of Environmental Quality (Secretary), and the North Carolina General Assembly Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources (NCGA Joint Committee) not approve Amendment 2 as written. The CCMFAB recommends that the MFC not approve draft Amendment 2 of the Southern Flounder FMP as proposed.

Southern flounder supports Carteret County's and North Carolina's most economically important commercial finfish fishery and are an important recreational fishery in estuarine waters. The proposed Amendment 2 recommends a 62% reduction in fishing mortality the first year that includes the fall of 2019 and a 72% reduction the next year. These proposed reductions will have devastating impacts to the fishing economies of Carteret County. The Division of Marine Fisheries and the MFC have decided to pursue an accelerated timeline for adoption of Amendment 2 to adopt substantial reductions in commercial and recreational harvest (i.e., fishing mortality), and have chosen fishing reduction goals that are not practicable or reasonable when considering the economic impacts, biology of southern flounder, management history, and possibly environmental conditions.

Substantial reductions in fishing mortality within the first two years are due to a statutory requirement by the General Assembly (G.S. 113-182) to end overfishing within two years, when developing FMPs for North Carolina's commercially and recreationally important species. However, the General Assembly gave discretion to the DMF/MFC to not apply the two-year overfishing stoppage requirement where the biology of the particular fish, environmental conditions or lack of sufficient data make ending overfishing in two years incompatible with professional standards for fisheries manage-

Appendix 1. Public Comment Received Through The Mail.

The Honorable Governor Roy Cooper
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May 29, 2019

ment. Based on the stock assessment, overfishing could be stopped in two years by a 31% reduction in fishing removals. On the other hand, to reach the FMP's overfished threshold a 52% reduction could be applied.

The stock assessments of southern flounder dated January 2017 and 2019 are technically sound and were peer-reviewed in a public setting by an outside group of reputable scientists. Still it is perplexing that stock assessment findings indicated that the biology and environmental conditions influencing the sustainability of southern flounder, plus the impacts of substantial management actions the last 15 years are confounding. A peer-reviewed assessment of southern flounder indicates that the population of southern flounder has been overfished for over 28 years and that fishing has occurred at rates too high to sustain the population during those 28 years. Yet, southern flounder live only up to eight years in age and have continued to support productive commercial fisheries for those 28 years. In addition, data does not reflect any long-term declining trend in numbers of young flounder recruiting into North Carolina waters.

Also confounding is that the recent stock assessment indicated the spawning stock continues to decline despite substantial restrictions that have been put in place. Size limits were initiated in 1979 and have been increased steadily to 15 inches in 2016. Commercial fishing efforts have been substantially reduced the last 18 years, with gill net yardage reduced, allowable fishing days reduced, reducing the number of hours gill nets can be fished, and completely closing fish areas. The majority of these measures were based on two prior stock assessments in 2001 and 2009.

The CCMFAB suggests that the stock assessment, although technically sound (i.e., appropriate statistical methods were used) that a high degree of uncertainty exists in the assessment. These uncertainties include (1) the lack of a comprehensive fishery independent index (surveys developed by the southeastern Atlantic states), (2) a lack of data for the offshore southern flounder component that are mostly older adult females, (3) a weak relationship between the spawning stock and the recruits they provide, (4) the unpredictable oceanic conditions where southern flounder spawn, (5) interannual variation in recruitment; i.e., juveniles, and (6) a recent study by North Carolina State University that indicated environmental conditions may cause changes in the proportions of males and females that further complicate the management of this species.

The proposed measures are problematic in that the estimated reductions in fishing mortality must be obtained from all the southeastern Atlantic states where southern flounder occur. North Carolina is planning on implementing significant reductions this fall, while it will be some time before states can implement similar measures or if they even choose to do so. North Carolina already has some of the most restrictive recreational fishing measures among the southeastern states.

Additionally, the DMF and MFC used 2017 (termed the terminal year) "removals" to achieve reductions. Fisheries experts recognize that the terminal year estimates contain

Appendix 1. Public Comment Received Through The Mail.

The Honorable Governor Roy Cooper
Page 3 of 3
May 29, 2019

the most uncertainty. The DMF could have used an average of the most representative years.

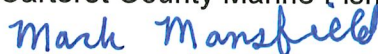
All these issues provide evidence that pursuing an accelerated version of an FMP Amendment -- that was adopted after the 1997 Fisheries Reform Act (FRA) -- does not abide by the 10-year overfishing stoppage requirements of the FRA to develop sound management strategies for the conservation of southern flounder. This should dissuade the State from proposing unreasonable accelerated fishing reductions.

The CCMFAB supports management of southern flounder that incorporates the whole body of available evidence and takes into account the biology of the fish, environmental conditions, prior management actions and uncertainties about the data, from which reasonable measures can be enacted. Measures to stop projected overfishing -- (1) a 31% reduction in the "overfishing threshold," (2) removals derived from mean or median of 1989-2017 Spawning Stock Biomass, and (3) dissuade the State from pursuing an accelerated version of the Amendment -- could be implemented and a new stock assessment performed as quickly as possible (within two years) to examine if the population responses or other factors are more at play than fishing mortality.

Sincerely,



Jonathan Robinson, Chair
Carteret County Marine Fisheries Advisory Board



Mark Mansfield, Chairman
Carteret County Board of Commissioners

copy: Michael Reagan, Secretary DEQ
Representative Pat McElraft, Co-Chair Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Representative Jimmy Dixon, Co-Chair Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Senator Brent Jackson, Co-Chair Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Senator Norm Sanderson, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Senator Toby Fitch, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Senator Stephen Ross, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Senator Andy Wells, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Representative Kyle Hall, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Representative Chuck McGrady, Joint Legislative Oversight Committee on Agriculture and Natural and Economic Resources
Steve Murphey, Director DMF
Rob Bizzell, Chairman MFC

Board of Commissioners

Earl Pugh, Jr., Chair
Tom Pahl, Vice-Chair
Benjamin Simmons, III
Shannon Swindell
James Topping

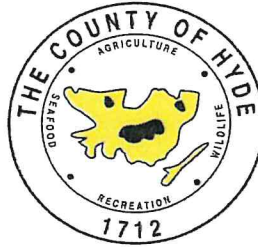
COUNTY OF HYDE

30 Oyster Creek Road
PO Box 188
SWAN QUARTER, NORTH CAROLINA 27885
252-926-4400
252-926-3701 Fax

Kris Cahoon Noble
County Manager

Franz Holscher
County Attorney

Lois Stotesberry, CMC, NCCCC
Clerk to the Board



**RESOLUTION Against Southern Flounder Amendment 2 and the North Carolina Division of Marine Fisheries Recommendation to the North Carolina Marine Fisheries Commission
June 3, 2019**

WHEREAS, the Southern Flounder Amendment 2 and the North Carolina Division of Marine Fisheries are recommending to cut the southern flounder harvest by 62% in 2019 and 72% in 2020;

WHEREAS, the southern flounder fishery is absolutely a cornerstone of the Ocracoke and Hyde County economy;

WHEREAS, Ocracoke Seafood is the only fish house left on Ocracoke Island and is a fishermen owned enterprise that buys fish, oysters and clams from over 30 fishermen;

WHEREAS, the income generated by sales to Ocracoke Seafood Company supports fishing families, Ocracoke's local tourism economy and Hyde County's tax revenue and sustainability;

WHEREAS, Ocracoke's tourism economy is supported by 12 restaurants which depend on fresh, local seafood to satisfy tourists craving for fresh Ocracoke seafood;

WHEREAS, fresh, wild-caught seafood is one of the top tourist attractions on Ocracoke, adding to the \$1 billion of tourist revenues North Carolina gains yearly from the coastal region;

WHEREAS, 20% of all tourists visit the coast of North Carolina specifically to eat locally caught seafood;

WHEREAS, Ocracoke Seafood Company depends on the diversity of species that the pound net harvest provides throughout the fall to stock the seafood retail and an October 17th closure will remove the primary source of wholesale landings in the months of October and November;

WHEREAS, the recommendation by the North Carolina Division of Marine Fisheries at the North Carolina Marine Fisheries Commission meeting to cut the southern flounder harvest by 62% in 2019 and 72% in 2020 with an October 17th closure to the flounder season will make Ocracoke Seafood Company unprofitable;

WHEREAS, Ocracoke Seafood Company's payroll to Ocracoke fishermen averages \$600,000 annually and supports 4 full time employees;

WHEREAS, the income generated at Ocracoke Seafood Company is recycled into the Ocracoke economy making an exceptional impact during the winter months when jobs and tourists are non-existent;

WHEREAS, Hyde County is a Tier One, Economically Disadvantaged County and the second most impoverished county in the state of North Carolina generating it's sole economic survival from agriculture, commercial fishing and tourism;

Appendix 1. Public Comment Received Through The Mail.

WHEREAS, the loss of Ocracoke's flounder fishery would eliminate jobs, decrease tax revenue through commercial fishing sales and erase the presence of a fish house on the Ocracoke harbor which is essential to the tourism market that has evolved from this mutually dependent relationship of tourism and fresh seafood;

WHEREAS, Ocracoke Village would not be the same without a fish house and enacting Amendment 2 would negatively affect all business on Ocracoke Island, endanger the presence of the fish house, and this is unacceptable to Ocracoke and Hyde County;

WHEREAS, the Central Region is too large and diverse in regard to flounder harvest and should be divided into two subregions to allow fishermen on the east and west sides of the Pamlico Sound equal opportunity to participate in the fall pound net fishery;

WHEREAS, over the last five years, setting pound nets along Ocracoke and Hatteras have been delayed due to hurricanes and until mid October the catch is primarily summer species including spade, butterfish and pompano;

WHEREAS, to be economically feasible, pound net fishermen need a 5-week season starting October 1st and ending after the first week of November, which allows the owner a two week period to recover the expenses of fishing and two - three weeks for the owner and crew to make a profit for the months of work it took to prepare for the fishery;

WHEREAS, Ocracoke Seafood Company is recognized as one of the Golden Leaf Foundation's most successful projects in eastern North Carolina and has been studied by multiple national organization and the Food and Agriculture Organization of the United Nations for its unique fishermen owned business model;

WHEREAS, Ocracoke Seafood Company ships seafood throughout North Carolina, specifically targets Raleigh markets and is recognized by companies and tourists who purchase seafood as one of the best examples of fresh, local North Carolina seafood;

WHEREAS, Amendment 2 and the current North Carolina Division of Marine Fisheries recommendation to the Marine Fisheries Commission will place all of the dedication, hard work and funding to rebuild the Ocracoke fish house over the last twelve years in dire economic jeopardy;

WHEREAS, the Southern Flounder Advisory Committee has recommended a 31% reduction in flounder harvest in 2019 and a 52% reduction in 2020 with that recommendation being developed through significant debate of the data and multi stakeholder input and allows commercial fishermen one year to adjust their business models that may keep a portion of the pound net fishery operational;

WHEREAS, the average age of a North Carolina commercial fisherman is approaching the mid 50's and those fishermen hold all of the capital and experience in the fishing industry and as they are continually pressured they will retire and move into other fisheries that creates additional stress on those fisheries as well while endangering the commercial fishing industry and damaging the coastal tourism industry;

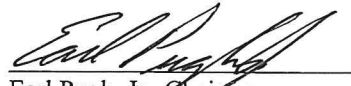
WHEREAS, the mainland portion of Hyde County has already lost approximately 95% of its flounder fishery, flounder fishermen, fish houses and the economy that those supported because of restrictions that have already been placed on the fishery over the past years, skewing the numbers on the mainland to create an illusion of decreased harvests and decreased stocks because regulations have reduced the number of fishermen and the effort within the fishery;

NOW, THEREFORE, BE IT RESOLVED, that the Hyde County Board of Commissioners unanimously recommend that Amendment 2 and the current North Carolina Division of Marine Fisheries recommendation to the Marine Fisheries Commission be voted against and that the two entities work to find a compromise that will rebuild the southern flounder stocks and end overfishing without destroying fishing families, fishing communities and the seafood infrastructure needed to get seafood to market in and outside of the Great State of North Carolina.

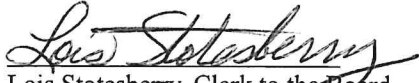
NOW, THEREFORE, LET IT FURTHER BE RESOLVED, the Hyde County Board of Commissioners unanimously recommend the North Carolina Division of Marine Fisheries and the Marine Fisheries Commission consider the adoption of the recommendation of the Southern Flounder Advisory Committee of a reduction of 31% in 2019 and a 52% reduction in 2020 with a 5-week season starting October 1st and ending after the first week of November.

Appendix 1. Public Comment Received Through The Mail.

Adopted this the 3rd day of June, 2019.



Earl Pugh, Jr., Chairman
Hyde County Board of Commissioners



Lois Stotesberry, Clerk to the Board
Hyde County Board of Commissioners



Board of Commissioners
Mark Mansfield, Chair
Robin Comer, Vice-Chair
Bob Cavanaugh
Jimmy Farrington
Jonathan Robinson
Bill Smith
Ed Wheatly



County Manager
Tommy R. Burns

Clerk to the Board
Rachel B. Hammer

RESOLUTION
OPPOSING PROPOSED AMENDMENT 2 OF THE SOUTHERN FLOUNDER
FISHERY MANAGEMENT PLAN

WHEREAS, the Carteret County Board of Commissioners rely on the members of the Carteret County Marine Fisheries Board to advise them of relevant issues that would have a detrimental effect on the County's recreational and commercial fishermen; and

WHEREAS, members of our Marine Fisheries Advisory Board, some of whom are recreational fishermen and head boat operators familiar with the fishery of North Carolina, are greatly concerned about the proposed Amendment 2 of the Southern Flounder Fishery Management Plan; and

WHEREAS, the Carteret County Board of Commissioners supports the position of the Carteret County Marine Fisheries Board concerning the proposed Amendment 2 based in part on the following:

- Southern flounder supports Carteret County's and North Carolina's most economically important commercial finfish fishery and are an important recreational fishery in estuarine waters;
- The proposed Amendment 2 recommends a 62% reduction in fishing mortality the first year that includes the fall of 2019 and a 72% reduction the next year which will have devastating impacts to the fishing economies of Carteret County;
- The Division of Marine Fisheries and the MFC have decided to pursue an accelerated timeline for adoption of Amendment 2, and have chosen fishing reduction goals that are not practicable or reasonable;
- The 10-year overfishing stoppage requirement where the biology of the particular fish, environmental conditions or lack of sufficient data are incompatible with professional standards for fisheries management;
- The stock assessments of southern flounder dated January 2017 and 2019 are technically sound and were peer-reviewed in a public setting by an outside group of reputable scientists;
- Commercial fishing efforts have been substantially reduced the last 18 years, with gill net yardage reduced, allowable fishing days reduced, reducing the number of hours gill nets can be fished, from 2003 to 2015, we went from 1,000 to 300-pound nets – a 70% reduction, and completely closing fish areas;
- A high degree of uncertainty exists in the stock assessment including: (1) the lack of a comprehensive fishery independent index, (2) a lack of data for the offshore southern flounder component that are mostly older adult females, (3) a weak relationship between the spawning stock and the recruits they provide, (4) the

Appendix 1. Public Comment Received Through The Mail.

unpredictable oceanic conditions where southern flounder spawn, (5) interannual variation in recruitment; i.e., juveniles, and (6) a recent study by North Carolina State University that indicated environmental conditions may cause changes in the proportions of males and females that further complicate the management of this species;

- The DMF and MFC used 2017 (termed the terminal year) “removals” to achieve reductions. Fisheries experts recognize that the terminal year estimates contain the most uncertainty; the DMF could have used an average of the most representative years;

WHEREAS, these issues provide evidence that pursuing an accelerated version of an FMP Amendment, that was adopted after the 1997 Fisheries Reform Act (FRA), does not abide by the 10-year overfishing stoppage requirements of the FRA to develop sound management strategies for the conservation of southern flounder; and

WHEREAS, the Carteret County Board of Commissioners supports management of southern flounder that incorporates the whole body of available evidence and considers the biology of the fish, environmental conditions, prior management actions, and uncertainties about the data;

NOW THEREFORE BE IT RESOLVED that the Carteret County Board of Commissioners reaffirms its unwavering commitment to North Carolina’s fishing industry by supporting the position of the Carteret County Marine Fisheries Board and strongly opposes Amendment 2 or any other action that would cause continued harm to the County’s recreational and commercial fishermen.

ADOPTED, this the 3rd day of June 2019.

Mark Mansfield

Mark Mansfield, Chairman
Carteret County Board of Commissioners

Attest:

Rachel Hammer

Rachel Hammer, Clerk to the Board



mail to: Southern Flounder Comments
PO Box 769
Morehead City, NC 27960

to: NCDMF Flounder Comment
Staff.

RE: Please find two public
Comments that we would like
to have submitted regarding the
NCDMF proposed southern flounder
management measures.

- Ocracoke Seafood
- Soundwaves Seafood.

Appendix 1. Public Comment Received Through The Mail.

Public Comment against Southern Flounder Amendment 2 and NCDMF recommendation to the NCMFC

Ocracoke Seafood Company is a fishermen owned enterprise and is the only fish house left on Ocracoke. It represents that last location where for over 30 fishermen can sell their catch (fish, clams and oysters). Without the fish house, fishermen will have to transport their catch via vehicles to Hatteras or Wanchese. Transportation costs and logistics will make it unprofitable for fishermen to continue to fish without a fish house. NCDMF's proposed southern flounder management measures of 62% reduction in 2019 and 72% in 2020 makes Ocracoke Seafood Company's future doubtful. Ocracoke Seafood Company supports the AC recommendation of 31% reduction in flounder in 2019 and 52% in 2020.

Ocracoke Seafood Company's payroll to Ocracoke fishermen averages \$600,000 annually and supports 4 full time employees. That income is recycled into the Ocracoke's economy, especially during winter months when jobs and tourists are nonexistent. Hyde County is NC's second poorest County with few industries that can replace the loss of commercial fishing income so it cannot afford to lose Ocracoke Seafood Company's payroll, tax revenue generated by Ocracoke Seafood Company and the iconic presence of the "Fish House" on the harbor that supports tourism and Ocracoke's fishing heritage. Ocracoke is a fishing and tourist economy that is mutually dependent on each other. Ocracoke Seafood Company agrees with the Ocracoke Business and Civic Association's (quote from their public comment) assessment that "Ocracoke Village would not be the same without the "Fish House". The enacting of Amendment 2 would negatively affect all business on Ocracoke Island and would put Ocracoke Seafood Company in jeopardy of closing. This is unacceptable to Ocracoke."

To survive economically, Ocracoke Seafood Company recommends a flounder season that extends to Nov. 10th. Whatever the cutbacks are, the Central region needs to be managed equitably so the southern end gets the same opportunity to land flounder as the north end. Ocracoke is the southernmost community in the Central Region so it sees the flounder migration last and it has a high percentage of pound nets that fish off the reefs in deep water. Ocracoke Seafood Company recommends a flounder opening not before Oct. 1 and would prefer the 6th to help reach a Nov. 10th date for the closure. This allows pound netters who set in deeper water along the reefs time to catch some flounder and time to harvest some portion of the sheephead run. Without some semblance of the proposed season, Ocracoke Seafood Company will be out of business! **This is not hyperbole or drama. It is a fact!**

Thank you for your time and consideration.

Sincerely,



Hardy Plyler

Ocracoke Seafood Company Manager

mail to: Southern Flounder Comments
PO Box 769
Morehead City, NC 27960

to: NCDMF Flounder Comment
Staff.

RE: Please find two public
Comments that we would like
to have submitted regarding the
NCDMF proposed southern flounder
management measures.

- Ocracoke Seafood
- Soundwaves Seafood.

Appendix 1. Public Comment Received Through The Mail.

Public comment against Southern Flounder Amendment 2 and NCDMF recommendation to NCMFC

Soundwaves Seafood is a 20-year-old seafood company based on Ocracoke Island. The company is owned by David and Amy Hilton and employs a full time deck hand. The recommended southern flounder management measures will devastate Soundwaves Seafood, Ocracoke Seafood Company, Ocracoke's fishing families and make fresh seafood to Ocracoke citizens and tourists during the fall months nonexistent.

Soundwaves Seafood Company is against NCDMF's proposed management measures to cut southern flounder harvest by 62% in 2019 and 72% in 2020. Soundwaves Seafood Company supports the Southern Flounder AC recommendation of a 31% reduction in flounder harvest in 2019 and a 52% reduction in 2020.

Pound nets are the primary gear used by David Hilton to catch fish throughout the year. He sets up to 3 summer pound nets and up to 5 fall pounds. Pound nets are recognized as one of the most ecologically responsible forms of fishing in NC and provide some of the highest quality seafood that is harvested in NC. Even the recreational community have recognized the value of pound nets as a type of fishing gear that should be preserved.

Each pound net and corresponding lead is built by hand and it takes two vessels to fish and set the gear. A low estimate of money invested in the nets and vessels would be \$50,000 and that does not take into account the cost to establish the sets (stakes, rope, time and fuel). Attrition in the pound net fishery is going to be significant which makes NCDMF's estimate of landings, fishing effort, escapement and bycatch mortality at best overly conservative. Furthermore, the average age of a NC commercial fishermen is approaching the mid 50's or older and they own most of the pound net crews which means the capital and experience in the fishery is going to retire or move into other fisheries that are already stressed (crabs or gillnets).

To survive economically, my business needs a pound net (flounder) season that extends to Nov. 10th. Whatever the cutbacks are, the Central region needs to be managed equitably so the southern end gets the same opportunity to land flounder as the north end. Ocracoke is the southernmost community in the Central Region so it sees the flounder migration last and it has a high percentage of pound nets that fish off the reefs in deep water. I recommend a flounder opening not before Oct. 1 and would prefer the 6th to help reach a Nov. 10th date for the closure. This allows pound netters who set in deeper water along the reefs time to catch some flounder and time to harvest some portion of the sheephead run (very important part of my income now). Without some semblance of my proposed season, Ocracoke will be out of business! **This is not hyperbole or drama. It is a fact!**

Thank you for your time and consideration.

Sincerely,

David and Amy Hilton

A handwritten signature in dark ink, appearing to read "David Hilton & Amy Hilton", written in a cursive style.

May 30, 2019

To Whom it may concern,

As a life long Commercial fisherman I disagree with the Divisions take on flounder stocks. According to you landings are down. My landings have continually gone up for the last three years in a row. I have also expended less effort then in previous years. I am sure that I am not the only one. If you put the 62% reductions in place that are being proposed it will be disastrous to my botton line and my livelyhood. If you must do this I propose an individual take permit be put into place, based on each fishermans past landings. As for the Seasons they vary from the northern area to the Southern area. One season can not cover the entire state. With these reductions I propose the season should open ~~from~~ September 15 and run through the end of November, this would cover all of the areas. Bad weather and hurrieanes must also be taken into consideration. I personally think the Division is determined to put the commercial fisherman out of business. If these reductions must be put into place. Please step up to the plate and buy us out based

on past landings and gear. Thank you
for your time and consideration on
this matter.

Jesse Spencer
JESSE SPENCER

JOE E. BUNN 5/29/19
PRESIDENT

ROCKY MOUNT CORD CO.
P.O. DRAWER 4304
ROCKY MOUNT, NC 27803-0304
(252) 977-9130 • (800) 342-9130
www.rmcord.com
E-mail: jbunn@rmcord.com

Leave the Southern flounder
limit as is. There are plenty
of flounder.
Thanks,

Joe

May 30, 2019.

TO: STEVEN MURPHEY
Dee Jupton.
Nancy Fish
Kathy Rawls

All those involved with draft Amendment 2
to the Southern Flounder Fishery Management
Plan.

Greetings.

First I have a word for you that I
was awakened with about one month ago.
I sent it to the board of Commissioners
but several did not receive it because their
email addresses had been changed. Mind
you, I am just the messenger.

Isaiah 10 v 1-2

"Woe to those who make unjust laws,
to those who issue oppressive decrees, to deprive
the poor of their rights and withhold justice
from the oppressed of MY People..."

You all should consider carefully what you
are planning to do.

Sincerely,

Robert McBride

P.O. Box 581 Erisco NC
27936

May 31st

To Stephen Murphy, Dee Zuptor, Nancy Fish
Kathy Pauls, board of Commissioners,

I am a commercial pound net fisherman
from Hatteras and have fished not only
for summer fish but for flounders for the
last 40 years on the backside of our
reef, about 4.6 miles offshore in the
Pamlico Sound. My nets have not moved
at all in these years. I am fishing
the same exact places for 40 years.

I've tried to pay attention to things as
most fishermen do in order to better
understand what I am doing. The main
factor I've seen and am determined about is
the fact that weather plays the major
part of harvesting and species of fish
and most definitely is the major
determining factor with flounder. I can
go through five years, having kept records,
to verify what I am telling you. When
there have been years of storms, fishing
has fell off. Mid eighties till 1993 were
fairly quiet years and fishing was good.
1993 there was a big storm and fishing was
not so good. 1994-1999 fishing was great.
Another storm, Floyd came and was terrific

fishing that year but the following 2 years was way off. 2003 another bad storm and fishing suffered the next 2-3 years here. ~~Study~~ Another storm in 2006 and fishing not so good. 2009 another storm and fishing was off. 2010 thru 2015 we experienced good fishing once again as the storms stayed away or were early enough not to effect things. 2016 a major storm and the worst season ~~pass~~ in 12 years. Rebounding the last two seasons ^{Storm} R.B.

Storms small a factor

I give you this history because of your very limited way of determining the stock assessment. Many years fish go by and noone catches them because the weather just cooperated. The weather is the great determining factor on what is caught. You all absolutely ignore this and go on with your statistiss that are gathered from someone standing at the dock with a tape measure in their hand measuring only the fish that are brought to the dock. What a joke! In all my years of fishing, I have yet to have 1 person ride along to see how many fish didn't make it

to the dock but were tossed back because they were undersized. Amazing to me that you could have any idea what's out in the water when you spend NO Time on the water!

You make laws that regulate the size fish we can take and guess what happens? As your laws increase the size limit (from 13, to 14, to 15) the size of the fish have increased.¹¹

Kathy Rawls told me that, in regards to the volume of fish I throw back daily, it was such a small sample in terms of the area, it couldn't determine anything conclusively? Really? I can remember when there were pound nets set from Avon all the way to Ocracoke inlet on the back of the reef and everyone discarded an abundance of fish daily, I'm quite sure the same would be true today if there were anyone out there fishing. Where at one time, 17 crews fished between Avon and Ocracoke today there are 2 of us that actually try at it.

Overfishing is NOT the problem. The weather patterns are the main factor in catching Flounder.

The 2014 Pier assessment, information your scientists produced stated conclusively that they had no idea how the stock of southern flounder remained to go healthy. They couldn't explain it. They did recommend 2 things which you have basically ignored along with the evaluation of the stock. No. 1 was to pool information from the states south of us to better understand where our fish migrate to. ~~No. 2 was an observer program.~~ I know that you are working towards this end right now. But you're going the wrong way! It is absolutely obvious as the waters have warmed, fish in general have not migrated as far N to South as they once did. In other words the fish that once may have been in South Carolina aren't here any longer because in warm months they go further north. The divers off our coasts have seen incredible numbers of flounders that winter in our area and validate what I say.

No. 2 recommendation was for an observer program to be initiated. Why

didn't you listen to the 2014 report? Why don't you actually work with the fishermen instead of against them continually?

Forty years of experience has to have some value to you when your methods of gathering information are so ridiculously limited. To make an assessment on solely what is observed and to ignore all that is not seen is ~~the~~ most naive, unless there is an agenda you're working towards. Which, I, believe, there is.

I hope someone takes the time to read this. I took the time to write it,...

Regards. Bob McBride

APPENDIX 2

**SUMMARY OF PUBLIC COMMENTS
DRAFT SOUTHERN FLOUNDER FISHERY MANAGEMENT PLAN AMENDMENT 2
FINFISH, NORTHERN REGIONAL, AND SOUTHERN REGIONAL
ADVISORY COMMITTEES JOINT MEETING
CRYSTAL COAST CIVIC CENTER
3505 ARENDELL STREET, MOREHEAD CITY, NC
JUNE 3, 2019, 12 PM**

Public:	Approximately 40 members of the public, which included 13 individuals that provided comment
Marine Fisheries Commission:	Rob Bizzell, Mike Blanton, Cameron Boltes, Chuck Laughridge, Sam Romano
Division of Marine Fisheries Staff:	Steve Murphey, Dee Lupton, Nancy Fish, Kathy Rawls, Katy West, Tina Moore, Mike Loeffler, Anne Markwith, Laura Lee, Charlton Godwin, Dana Gillikin, Patricia Smith, Jennifer Lewis, Lee Paramore, Chris Stewart, Stephanie McInerny, Catherine Blum, Carter Witten, Jason Walker, Garland Yopp, Ashley Bishop, Michele Turner, Zach Odom, Joe Guthrie, Gina Griffin, Debbie Manley, Rachael Kelly, Kelly Odom, Brandi Salmon, Jesse Bisette, Trevor Scheffel, Alan Bianchi, Thom Tears
Media:	None

Marine Fisheries Commission Chairman Rob Bizzell chaired the joint meeting of the Finfish, Northern Regional, and Southern Regional advisory committees for review of the draft Southern Flounder Fishery Management Plan Amendment 2. During the meeting, a public comment period was held. Each person who wished to speak was allotted up to three minutes to provide comments.

Summary of Public Comment

Jonathan Robinson, a Carteret County Commissioner, chairs a county marine fisheries advisory board on issues that may have a detrimental affect on the county. The panel does not support Amendment 2 to the Southern Flounder Fishery Management Plan. He said all management options in the amendment will cause extreme economic hardship. Problems with the amendment include not accounting for reduced effort in the commercial fishery, uncertainty in the stock assessment, lack of data about offshore adult female flounder, interannual variation in recruitment, and environmental conditions that affect the proportion of males and females in the southern flounder population.

APPENDIX 2

Charles Van Salisbury, a commercial fisherman from the mainland side of Hyde County, said the gill net fishery is a fraction of what it once was, and effort is at an all-time low. A Sept. 15 opening for all fisheries will create a derby fishery. He hopes the reductions from the incidental take permit requirements and the effect on the market will be taken into consideration.

Roger Harris, from Atlantic, said to stop trying to fix everything. He said there were no regulations when he grew up and there were plenty of fish and fishermen. With regulations, both are disappearing. What is being done is not working.

C.R. Frederick, a commercial fisherman from Swansboro, said a 52-72% reduction on a family's income will be devastating. He said if a reduction is needed, shut the fishery down for a couple of years. Fishermen will be better able to survive that than a 72% reduction for 10 years. He said there are so many variables involved, including relying on three other states to assist in restoring the stock and the lack of control over the effect of habitat on the fishery. He said the fishery needs something, but a lot of lives depend on this.

Glenn Skinner, Executive Director of the North Carolina Fisheries Association, referenced an earlier comment about not being concerned with what the other three states will do. He said that is admirable, but foolish because as soon as Amendment 2 to the Southern Flounder Fishery Management Plan passes, the clock starts for the next review of the plan to occur within five years, even without action by the other states. He said all four states need to implement reductions together or North Carolina carries the burden. He said the statutory requirements for ending overfishing in two years and rebuilding the stock in 10 years do not start until the adoption of the amendment, not the completion of the stock assessment. The process needs to slow down, and work needs to focus on the management measures for Amendment 3.

George Leone, a seafood dealer, said Amendment 2 to the Southern Flounder Fishery Management Plan is inappropriate due to the 62% and 72% recommended reductions, especially right before the start of the fall season. There is no time to prepare. Seafood dealers, markets, restaurants, gas stations, net makers, convenience stores, and countless others will be affected. He said the risk outweighs the reward, especially if a hurricane strikes. All four states need to take an active role so that North Carolina is not punished to allow the other states to reap the benefits.

Thomas McArthur said he has provided public comment on fisheries for years and this issue is just more of the same. He said the most important measure to implement is a slot limit. He said he thinks a proposed 52% reduction will result in a much greater actual reduction.

Karen Smith, a commercial fisherman from Cedar Island, expressed concern about the financial burden on many of the fishermen in her family. She said some of the younger fishermen will not be able to sustain a 52% reduction. She questioned if the commercial fishing heritage is being valued. She emphasized the financial burden of a 52% reduction for the pound net fishery.

APPENDIX 2

Bert Owens, from Beaufort, thanked the advisory committees and said their job is not easy. He said easy things do not achieve anything. Amendment 2 to the Southern Flounder Fishery Management plan is a good thing and is not expedited when you consider the stock has been overfished for 20 years. He said if we do not act, there will not be a heritage to preserve. He said to follow through with Amendment 2 and save some fish for the future.

Jason Webb, a commercial fisherman from Brunswick County, said there are several problems with Amendment 2 to the Southern Flounder Fishery Management Plan, including economic issues, the effect of water temperatures on the stock, and the harvest of primarily female fish due to the 15-inch minimum size limit. He said flounder in North Carolina come from here, so we do not need to worry about the other three states. He said electronic reporting of trip tickets should help process data more quickly to identify windows for fishing. Fishing guides, mechanics, and countless others will be affected by this amendment.

Phillip Goodwin, a commercial pound-netter for 40 years, said the pound net fishery will not survive the reductions proposed in Amendment 2 to the Southern Flounder Fishery Management Plan. Northern Core Sound used to have a pound net season from Sept. 1 until Christmas and then regulations were implemented. The size limit was increased several times, then a December closure was implemented. He said there is no more to give up and still be able to make a living. The pound net fishery is a clean fishery that has no bycatch and is turtle-friendly. He said he is against Amendment 2. Pound netters might be able to give up a few weeks of fishing at the beginning of the fall season, but they need several weeks of fishing to make a living.

David Sneed, Executive Director of the Coastal Conservation Association of North Carolina, said no one wants to see fisheries close. He said many people say more science-based decision-making is needed for fisheries management until they disagree with the science. He said the struggle for the advisory committees and the Marine Fisheries Commission is that we have been ignoring the science for over 20 years and we are running out of time. We have to act to save our fisheries for future generations.

Tom Roller, a full-time fishing guide from Carteret County, said if this meeting occurred in 2000 or 2005 there would be 400 people in attendance. With only 12 comments received, virtually no one is here because the fishery is gone. He thanked the Marine Fisheries Commission for moving forward with Amendment 2 to the Southern Flounder Fishery Management Plan.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019					Seasonal Closure Starting in 2020					Do you support additional non-quantifiable measures?					Comments		
				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None		No Preference	
5/24/2019	william	Levier	NC		1																		
5/24/2019	glenwood	montgomery	NC		1																		Until someone explains to me why southern flounder stocks in NC were recovering nicely five years after the first flounder management plan was enacted and then went to h** all of a sudden from 2010 forward I can not support the proposed plan due to lack of confidence in the data. With added restriction after 2010 plus numerous restrictions added due to sea turtle permit requirements someone needs to explain to me why the sharp drop in southern flounder population. Should have seen even better improvement after 2009 stock assessment showed lots of improvement albeit not enough to be declared recovered. The 40% increase in the target levels is also cause for concern since this act alone would quarrantee that reaching the new target level would not be reached by the time the last stock assessment was carried out.
5/24/2019	sonya	Levier	NC		1																		
5/24/2019	Jeff	Smith	NC		1																		1. Until there is valid recreational catch data (WIKIP doesn't cut it), statistics for Southern Flounder are flawed and should not be used. 2. Management plan lumps in Summer Flounder in the regulations under the assumption that Southern Flounder is the dominant species being harvested, or that the public is too ignorant to determine the difference between the 2 species. I might could consider reductions in Southern Flounder, if there was a different plan for Summer Flounder.
5/24/2019	david	jarvis	NC		1																		
5/24/2019	Bernard	Kaasmann	NC		1																		Rather than recreational seasons I would support a year round 2 fish limit. Consideration should be taken for the recent 6 to 4 fish limits as well as minimum size increases. My concern is that with no possession seasons is the pressure it will put on other species, ie Black Drum and Sheepshead.
5/24/2019	Robert	Horne	NC		1																		Cuts are too drastic.

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5/28/2019	Barron	Greenwalt	PA	1																			My Ocracoke vacations began in 1985 and they continue, it is folks like me, obviously, that make up Ocracoke's tourism revenue and contribute to Hyde County's sales tax. With that being said, I believe that the tourism voices matter and should adjoin the public comment on a proposal, the Southern Flounder Amendment 2. It has been said that the proposed regulations will affect more than the flounder catch. Therefore please consider the input from the Southern Flounder Advisory Committee. Their recommendation for a measured 31% reduction in 2019 and a 52% reduction in 2020, rather than proposal in Amendment 2 to cut southern flounder harvest by 62% in 2019 and 72% in 2020. A mutually beneficial compromise that will rebuild the southern flounder stocks and end overfishing, but not destroy fishing families or the seafood infrastructure needed to get seafood to market and communities that depend on fishing revenues.
5/28/2019	Howard	Albright	VA	1																			
5/28/2019	Howard	Albright	VA	1																			No to amendment 2
5/28/2019	Mary	Turners	NC	1																			This is way too much... please find a better solution.
5/29/2019	Edmund	Allen	NC	1																			If anyone is serious about protecting our fish stock then you would out law gill nets. They are destructive to all marine life. You could out law any type of trawling within at least 5 miles of the beach. Look at how Florida's fish stocks have thrived since they made these changes. I will be glad to talk to you on what I have observed in the past year and years. You cant keep saying you want to let them spawn and protect fish stocks while allowing gill nets stop bending to those who only have only agenda themselves and no one else. I've been around them and they don't respect other sport fishermen or our environment. Eddie Allen
5/29/2019	Andrea	Fulcher	NC	1																			This will be terrible for the commercial fishing community.
5/29/2019	Aundrea	O'Neal	NC	1																			What reduction measures will other states be implementing this year along with NC? I feel that it is not fair for NC fishermen, (commercial and recreational) to have to be the only ones to try to rebuild this stock, while other states are allowed to harvest southern flounder. This needs to be a joint state collaboration for the health of the stock or it is a complete economic loss to our great state.
5/29/2019	darren	sullivan	NC	1																			Recreational boaters are always the victims of fishing regulations when that have very little to do with fish populations. Especially Flounder.

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				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None		No Preference				
5/29/2019	Jeffrey	Hollis	NC	1																						I have commercial fished regularly for the past 5 years and have only seen a steady number or if any change it would be an increase in fish numbers. There are plenty of fish out there if you spend the time to find them. If this amendment passes it will cripple the commercial fishing industry here in NC and also cripple a large number of hardworking honest North Carolinians. Their livleyhood will be at stake and they will not have the ability to provide for their families. We should not let recreational fishermen and newly arrived citizens drive our decisions when it comes to the fishing industry. They do not spend the time on the water enough to know when and where the fish are and should not be allowed to have any impact on how the fishery is handled. Ask any commercial flounder fishermen and they will tell you what you need to know. Which simply put is there is a Healthy Number of Flounder in our water and the population is thriving. There should be NO CHANGE to the fishery.
5/29/2019	david	Jarvis	NC	1																						
5/29/2019	Matthew	Evans	NC	1																						commercial flounder gig fishery. My problem with Amendment 2 is that I don't understand why DMF has not already implemented daily limits for flounder on the gig/gill net/pound net comm fishery!!!! Instead of closing the fishery for basically almost 2 years why not start by establishing creel limits and the reduction of the pound net sets? DMF wants to claim the flounder are in trouble yet they want to continue to approve new pound sets weekly and issue SCFLs. Instead of always reduce the # flounder takenset limits and reduce the fisherman fishing for them. Buy SCFLs back and stop issuing would be a good step. Most states already do it. The next solution is you set creel limits for commercial fisherman and drop the size limit. Those limits will then be filled with male fish instead of all females. A fishery only targeting females is doomed from the start!!!!
5/29/2019	Aaron	Prince	NC	1																						
5/29/2019	Eric	Diaddorio	NC	1																						
5/29/2019	James	Watkins	NC	1																						Recreational fishing should not be eliminated or restricted by seasons like commercial fishing. Limits could be changed or size restrictions implemented but closing entirely is too restrictive and unnecessary if properly managed.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

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5/29/2019	bobby	lawrence	NC		1																		I'm sure you people are smart. I do not have the information you do, but it would not surprise me that you may have forgotten about the little problem of a hurricane we had last year. They completely stopped, for the most part, the landing of flounder. You have been saying for more years than I care to count, that you were doing what you were doing to make a substnabile fisheries. Well, from where I sit, every thing you have done has done no good. Look at the scallop fisheries in Bogue Sound. There is none. You made changes to save it. Look how that worked out. Anything you have done has not helped the commercial fisherman. Look at your track record. It looks to me like the point is the same as always. You always put the screw to the commercial fisherman in the name of substaining the fisheries, but everything you do ends up in support of sports fisheries and substaining that.
5/29/2019	Howard	Gaskill	NC		1																		
5/29/2019	Casey	Tolson	NC		1																		
5/29/2019	Wallace	Greene	NC		1																		
5/29/2019	Kelly	Aiken	NC		1																		Where is the science behind overfishing of southern flounder? Still have yet to see or hear any factual science regarding the current stock assessment. In fact, I do believe I heard a scientist say he could not give an adequate assessment without more information. You can not cut an fishing industry by more that 50% in the immediate calendar without giving the families that rely on that Fishery to feed their families for the long winter to come an opportunity to prepare for a reduced income, seek other employment opportunities, or invest in alternate fisheries (which take both time and money to be able to prepare for and afford to take part in). Science is needed. Compromise is needed. It is rediculous to think that coastal communities and commercial industry would want to dissipate a species they rely to heavily on.

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5/31/2019	Kenneth	Broadwell	NC	1																		Amendment 2 will surely force most commercial fishermen out of business. I disagree with the seasonal approach and recommend using slot size instead. Suggest 13 to 19 inches. No creel limit on recreational. Need to clarify how this would or would not affect Summer Flounder. The current system intentionally does not distinguish because of the belief that recreational fishermen cannot distinguish between the two species. Fix that and allow summer flounder to be caught, gilled, netted, etc. recreational flounder data, numbers are too high. I never released a flounder hook and line that did not swim back down upon release. Discard number should be very low. I have little faith in the DMF scientists and the MFC that have for the past 20 plus years have used size and creel limits, gill net mesh size to manage the fish stock. Things have deteriorated to the point now that you want to use seasonal closures. What's next? End fishing like the herring?
5/30/2019	Clay	Knudsen	NC	1																		
5/30/2019	Cane	Faircloth	NC	1																		I own and operate a Fishing charter business out of Holden Beach, NC. Flounder is a key fish in our business and one of our customers favorites to eat and fish for. This management process being looked at is terrible. I urge this one to go back to the drawing board and come up with a more realistic approach. With current proposals economic interest in this fishery would be severely impacted for bogus reasons.
5/30/2019	Tara	Collins	NJ	1																		
5/30/2019	Tom	Salter	NC	1																		I'd like to see no flounder caught outside the inlets for 2yrs, commercial or recreational. Close pound nets for two years, reduce gill net harvest by a third for 2years. Apply a slot for recreational catch between 14-19" for 2years.
5/30/2019	Don	Gaskey	NC	1																		I don't understand why, when commercial fishing causes a problem, that recreational fishing has to be hit so dramatically. Recreational fishermen harvest much less, in a lifetime, than commercial fishing does in a single trip plus, they can just throw the dead undersized flounder away without any penalties.
5/30/2019	ZACHARY	WILLIS	NC	1																		I am a commercial fisherman and rely on flounder to feed my family. Limiting the number of flounder I can catch and times of year I can fish greatly affect my income and being able to take care of my family. There are plenty of flounder I do very well giggering.

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5/30/2019	Alison	Willis	NC	1																				I support the moratorium! As a pound netter, I will be unable to continue setting pound nets with the proposed closure dates. The preemptive, annual capital investments required to set pound nets is too great to warrant setting in the midst of hurricane season for such a short season! We typically do not set until after the proposed 2020 closure. The risks far outweigh the potential benefit! I support a total closure to allow for quick recovery. To be clear, I believe there are some issues with the flounder stocks, however I believe the current assessment has vastly overestimated the issues with the stock.
5/31/2019	Chris	McCaffity	NC	1																				Many fishermen feel as if our public comments fall on deaf ears resulting a complete lack of confidence in the process. Official information about Amendment 2 explains how the rush to close our Southern Flounder fishery supersedes any meaningful discussion about options for rebuilding this mismanaged stock. https://deq.nc.gov/about/divisions/marine-fisheries/information-southern-flounder-amendment Public support for solutions that benefit everyone and the environment can open the ears of fishery managers. Stocking is one of those solutions we should seriously consider. We can make our Southern Flounder fishery better than ever if we choose to. The alternative is more closures and regulatory discards with a push to allow industrial fish-farming in our public waters. I am happy to discuss how wise use of hatcheries can promote freedom, food security, and sustainable fisheries for the benefit of all NC citizens. Does anyone have a better idea? Thank you, Chris McCaffity
5/31/2019	John	Partin	NC	1																				This proposal would devastate then NC fisherman. North Carolina is blessed with waters that are vast and have the natural resources to provide working fishing families a livelihood unique to other states. These families have a heritage that spans generations. In my thinking, the enactment of his proposal would only cause importation of low level seafood from out of country sources. It also would benefit these other sources by increasing the price of seafood. I ask that this be struck down and a more intelligent examination take place. Though a small part, I have for years had a recreational gear license. This has enabled me to place quality seafood in my freezer for my family. I ask also that this be stricken from the proposal. thank you. John Partin

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6/2/2019	Steven	Giberson	NC	1																					I am a commercial fisherman and set flounder nets in section c every night that I can. In my behalf I wish I could be at this meeting but work will not allow me to attend. I believe the stock assessment is biased as to the classification of the fish in which 15 in is not available in abundance. Therefore in years past which would be in the 80s and early 90s there was an abundance caught ONLY because the size limit was at 8 in. In my argument as to what I throw back alive every night that I fish I believe that there is an extreme abundance of smaller fish but the larger class fish stay into the the ocean for a duration of time allotted to them. Thank you for listening to my opinion and hope you all very well. Regards Steven giberson
5/31/2019	Mitchell	Lassard	NC	1																					Treat everyone the same. If you close it for commercial close it for all. Including imports and farm raised fish. Close down the states making rules against N.C. what is the best thing for the flounder. Just make sure their is a problem just not knee jerk reactions like in the past. You have made too many terrible mistakes against the commercial fisherman.
5/31/2019	Robert	McBride	NC	1																					being a commercial pound net fisherman for the last 40 years, i may be somewhat qualified to give a different point of view. the pier group report for 2014 compiled by your own scientists unequivocally concluded that the southern flounder stock was healthy and they had no idea how it was so!! i appreciate that kind of honesty because they were telling the truth. if the pier group scientists were as honest as the former group they would indeed come to the same conclusion. the information used to assess the stock are so limited and incomplete they can't possibly tell the story. 40 years of fishing and not one time has an observer ever ventured into the sound. i find that amazing you can sit in a cubicle and figure out the stocks with a slide rule and some statistics ! you only consider what is brought to the dock and dismiss all that is discarded which just so happens to be the stock you are trying to assess! what foolishness. clearly you care little for the fish or the fishermen

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5/31/2019	Dylan	Bennink	NC		1																					Minimizing the length of the commercial flounder season to the dates proposed in Amendment 2 will drastically affect the economy of Ocracoke, NC, as well as all of coastal NC, in a negative manner. Minus time spent acquiring a BA in Geosciences and minors in Biology and Oceanography at UNCW, I have spent all 30 years of my life on Ocracoke. For the past 5 years, I have had the privilege and honor to feed the world with fish I have caught commercially in the waters surrounding my home. Tourists, who make up the majority of our island's business, travel to our area to partake in activities, culture and cuisines that are unavailable at their places of origin. Flounder, recreational and commercial, is an enormous component of the tourist's desire to visit coastal NC and nourish its delicate economy. I make my living full time on the water. If the pound net season is shortened to the dates proposed by amendment 2, my estimated total gross annual income will be reduced by at least 30%.
6/1/2019	perry	ellis	NC		1																					marine fisheriers is only gessing because they are going on no proof of anything other than trying to get nets out of the water, the CCA is strong in money politics and our stupid DEM GOVENER
6/1/2019	Kimberly	LeMay	NC		1																					I am 47 years old and have been in the seafood business all my life. In these years I have seen so many changes in the rules and regulations set by the state of NC. Rules and regulations that absolutely make no sense whatsoever. What I have learned since I began working full time since graduating high school in 1990, is that all species go through a cycle. What may be a good year for shrimp, maybe a bad year for flounders, spots, etc. But each species will come back! That was proven last year with all the shrimp caught in Core Sound. This flounder amendment is crazy! What if we looked at each one of you that makes these rules and said the best part of your yearly income can only be made within so many days of the year and after that sorry you can't work anymore. I wish that each one of you could spend a day with one of these hardworking fishermen. See what it's like to get up before the crack of day and work till way past sunset. These are not lazy people, they want to work.
6/2/2019	Tim	Marco	NC		1																					Please allow us access to local seafood. You are killing an industry. Listen to Mr. Bruno. PLEASE

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6/2/2019	STEPHEN	GREGORY	NC	1																							<p>i am interested in the possible state implementation of southern flounder fish hatcheries as already being used at unc in wilmington.info from 2017 i understand to show a release of 100,000 juvenile southern flounder into nc waters.if this is correct i would strongly recommend putting the full force of the division into study of the implementation of a hatchery and any diversion of funds necessary to achieve this task.it certainly would not be a quick fix but over the long term i think this would be a viable solution with any other options that are being brought forth. i would further request any info that is available on this subject be made public for support by our commercial fisherman and sport fisherman .we are all "in the same boat" so lets get our collective shoulders behind this and get it solved. thank you, steve</p>
6/2/2019	Brad	Robbins	NC		1																					<p>I feel like the data supporting amendment 2 is not correct. There is the same amount of flounder being caught today as there was 10 or 15 years ago. I am in Brunswick County and see no down turn in flounder landings. Your tracking of hook and line catches is highly accurate. Just like deer are tagged flounder should be tagged called to get accurate numbers for our recreation side of fishing. Also there is a large difference in how much fishing is done North of new river inlet compared to south of new river. The same changes should not apply state wide. Two different dynamics. These changes are not warranted. This type of drastic changes are not right. Amendment 2 should not be implemented in this manner without more data and consideration of the financial and recreational impacts. Also I fish Pender County big reports coming in from there as well. Thanks Brad Robbins</p>	
6/2/2019	Reid	Newell	NC		1																					<p>I do not use pound net gear. However, by enforcing gear to be pulled by October 17 just makes it not worth fishing for those who rely on its income. The substantial catches are after October. They essentially are just getting by until the fall and the only real profit comes in October-November. The coastal communities of North Carolina do not agree with this amendment. The local fishing economies would suffer if this is passed.</p>	

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6/2/2019	brandon	watson	NC		1																			I fish out of New River, NC. The number one fishery I participate in is large mesh gill nets. This is my primary income too support my wife and children. Not only do I catch flounder, but also many other species for profit with my large mesh gill nets such as black drum, red drum, lady fish, sheepshead. All which support my income, if this closure happens it will be almost impossible for me too continue my profession. That is not the only reason I am opposed too this amendment, the main reason is the data is not accurate, really the lack of data is what bothers me. I really think we should wait until catch totals are seen for the end of the 2019 year, I think many of you will be surprised if we are allowed too fish, this year will be the best in over a decade. The problem is not the lack of fish the problem is our inlets are jammed up providing lack of tidal flow where the fish can hardly even get in, Record numbers already fish and crabs this year because florence opened our inlets
6/2/2019	William	Fulcher	NC		1																			A lack of scientific evidence thus fails to offer support for this proposal.
6/3/2019	Michael	Padilla	NC		1																			This amendment is created and backed by sport fishermen. There is not any real scientific evidence to back these claims. Typical plot by CCA backed representative to take away commercial fisherman's livelihood.
6/3/2019	John Q	Public	NC		1																			I am a part-time commercial fisherman, full-time federal employee, and a resident in Carteret county. I do not want to see this amendment passed as it is written. I think the seasonal closures are far too restrictive. I think the better approach would be a total allowable catch for each region of the state. The short flounder season will put pound netters completely out of business and will make it hard for part time gill net fisherman to justify paying the \$400 license fee each year. If this amendment is passed as written, the commercial fishing annual license renewal fees need to be brought back down to \$200. There could be no justification from DMF why the observer program needs that much funding to observe large mesh gill nets for less than one month a year. License fees could be increased upon recovery of the flounder fishery.

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6/3/2019	Marlene	Taylor	NC		1																				<p>The common fishermen are not causing the problem or depleting the number of flounder. I live at the Point in Emerald Isle and watch the many shrimp boats sitting in the inlet to the sound. Their large nets catch everything in the water around them with no regard to species or size. This is where our flounder are going. There needs to be regulations on what the commercial fishermen can keep and how they handle their catch. The regulations on commercial fishermen that are in place must be enforced. Many species are dead by the time they are sorted. Too much lose!</p>
6/3/2019	larry	hopkins	NC		1																				<p>I know it's a waist of time but there is no mention of what these huge numbers of skates are doing to the reduction of fish, oysters, .They are like vacuum cleaners on the bottom. As for the rest I like the rest know that this is a done deal .Follow the money. One of the reason landings are down is you have a hard time catching fish when your nets are full of skates. Nobody has set in our area in the last month because of this problem. I also see nothing about bad water. I think for these special people to catch what they want they should build themselves impoundments stock it full used golf carts to get around .It would great on the environment . No boats on the water. Good Luck</p>
6/3/2019	Morton	Gaskill	NC		1																				<p>I feel that the issue of stock status of the southern flounder is one that can't entirely be explained due to fishing. The combination of the large mesh ITP and attrition in the pound net fishery over recent years has already reduced commercial fishing effort by significant margins. In the 1990s there were over 200 flounder pound nets in operation around Ocracoke island, whereas last year there were only 43. A confluence of natural factors has also impacted the pound net seasons in recent years, chief among them being hurricanes destroying gear and delaying fishing activities which have increased escapement. Additionally the recent pattern of high water temperatures persisting in the sounds has also reduced pound net harvests in the early season due to the fact that the flounder migration is controlled by water temperatures. In conclusion if any measures are adopted I would advocate for the 31% reduction as I feel it would help the stock without absolutely decimating the industry.</p>

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6/3/2019	William	Wood	NC	1																		<p>I do not have a problem with working to restore the flounder stock my problem is I do not think the data for the Recreational Fisheries is accurate I have tried to support the NCMF checks at the landing and I do not see how they can estimate the data for Recreational dead discards and catch. Its a lot of guess work. I always felt the Recreational Fisherman gets the worst of the regulation changes. All the other states on east coast do not have netting in inshore waters it has helped them by far.</p> <p>You are going to make it so Recreational Fisherman stop fishing as much and it will hurt the local business's when they do not go as much. None of the option that the nets out so it will not work as well as you data shows if nets are not taken out of the inland waters.The Recreational Fisherman in not the problem in fish management. A Recreational Fishing season and size and limits not going to help much.Please give Recreational Fishing a better deal than in these options. Thanks, W Wood</p>
6/3/2019	a	b	BC	1																		
6/3/2019	Ryan	Speckman	NC	1																		<p>The drastic measures that are being pushed through are very troubling. I'm not convinced that the data supports these measures on this scale, and it doesn't appear that our state managers do either. This feels like more of a political move, that will have major ramifications for not only commercial fishermen, but the many fish houses, processors, distributors, restaurants, etc. that give the citizens of our state access to the resource. Many of the so called "by-catch" species that go along with the flounder fishery (e.g. red drum, black drum, sheepshead, speckled trout, etc.) are just as important as the southern flounder itself, and these new regs will greatly diminish their availability as well. Before we know it, only one user-group will have access to our tax-payer resource, and it won't be the inland consumer.</p>
6/3/2019	Kyle	Warren	NC	1																		<p>As a native of Hatteras Island this bill would have a devastating effect for not just the local commercial fisherman but also the business that buy their product. Stop targeting the small guys, go after corporations who have fleets of 100' boats that do not come home and offload their catches at sea. The local waterman you are targeting with this bill have been sustainably fishing pound nets and other methods for flounder for centuries, they are not the issue.</p>

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6/3/2019	Candy	Bohmert	NC	1																		As a Pamlico County Commissioner, I am against any quotas that are set that are not based in science. There is no plausible science that says this drastic action needs to take place. I don't support this and am requesting my state representatives not to support it either.
6/3/2019	William	Gilbert	NC	1																		
6/3/2019	colton	robinson	NC	1																		its my opinion that the flounder stock has not decreased at the rate that is trying to be said however there are a lot more people targeting the fish. its my belief that gigs and nets should be mad commercial gear and there should be a limit of how many flounder should be taken a day/night of these gears. i believe that would help more than this assessment and keep the working man able to provide food for his family this is a agriculture state that thrives off of farming and the commercial fishing industry however i cant see this from anyone all i see is people against it in the early 90s there were thousands of commercial fisherman in north Carolina with the same stats that there is today with just a fifth of the fisherman there was then so explain to me how there is a decline in the flounder population im not against recreational fishing at all but i believe there is a lot of fish killed by gigs by en experienced fisherman that cant tell the size of the fish thanks again god bless
6/3/2019	Ronald	Davis	NC	1																		Based on previous issues, I do not trust the data. Another push to cripple and eradicate the commercial fisherman.
6/3/2019	Allen	Jernigan	NC	1																		I took my gigging charter down large mesh nets last night. We saw one legal flounder and scores or undersized flounder, red drum, black drum and sheepshead. This gear needs to be addressed and outlawed. Being involved with the flounder fishery for over 25 years both recreational and commercial, I will be the first to tell you that the size and numbers are not what they once were. That being said, the recreational community is not at fault for the flounder situation. It is the continued waste from gill net discards and the unregulated catch by pound nets. The elephant in the room needs to be addressed and gill nets as a whole need to be outlawed. A quota needs to be put on pounds. Traditionally large mesh fisherman and pound netters are part time fisherman and NCDMF data reflects that statement. These new regulations are going to crush the businesses that rely on recreational fishing in our state. Also, any type of net closures for flounder is going to put more net pressure on other species

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6/3/2019	Garritt	Jernigan	NC		1																				I all for it fishing is going down hill
6/3/2019	Jacob	Ledford	NC		1																				The problem is full netting. Every state has banned it except NC. Until we address that problem you people are wasting time and contributing to the loss of a resource that won't be here for our kids. Texas, Florida, SC...all have substantially better fisheries and it's a direct result of banning gill nets.
6/3/2019	Kim	Fara	NC		1																				If you want to help the flounder population, shut down the gill nets and leave the recreational fishermen alone
6/3/2019	Brandon	Taylor	NC		1																				Of anything should be limited it should be commercial net use. As a citizen who grew up in NC, pays taxes in NC, and fishes with my family, it should be a right to fish responsibly as well as enjoy our costal waters. I think loose regulations on commercial netting has increased over fishing. Recreational fisherman have had change after change on restrictions on restrictions. I've been a charter captain for 3years now and this is part of my income chartering clients that come to our coast looking fishing and gigging charters while they are on vacation and local folks that like to get fish to take home to eat. I dont see how yall can determine how it's over fish. I think if we fall in suit with what south Carolina is doing get all gill net or shrumping out of our inland waters we will definitely see a difference in all fishing. Thanks Gene Garris Gig-A-Bite Chaters
6/3/2019	Eugene	Garris	NC		1																				I think if we fall in suit with what south Carolina is doing get all gill net or shrumping out of our inland waters we will definitely see a difference in all fishing. Thanks Gene Garris Gig-A-Bite Chaters
6/3/2019	Tim	Thompson	NC		1																				We all know that commercial fisherman pays the most In fees to one entity. But the rec fisherman is the one who pays to many different entities over a period of time equaling much more in total proceeds to various entities. However the rec fisherman is the one getting the short end of the fishing to be caught and harvested all Because the commercial fishermans overkill of all species, which then requires more stricter regulations on all species of fish. The commercial fisherman are the ONLY ones hurting and killing the fish but yet you stiffen the regulations on rec fisherman and not commercial. It does not make sense at all. You are putting restrictions on the ones not doing any harm and allowing the commercial fisherman who are doing ALL the harm to carry on. Why? Because they pay more under the table? The fishery's will get better MUCH quicker if you limit the big killers which we ALL know are the netters. Common sense 101. Stop it with the political bulls*** and use common sense ty

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6/3/2019	Tommy	Dean	NC	1																				You know if you banned gill nets we wouldn't have this problem. I mean if you can't see that your a idiot. We need someone from Louisiana to run our fisheries because this is nothing more than you all lining your pockets. You don't give a f*** about our fisheries. It's all about money just be honest. If none of us bought a lisence and did what we wanted for years how bad would that affect the state. But I'm sure it will never change. Do what you want will do what we want
6/3/2019	Lane	Chris	NC	1																				I do not support anything that takes more away from rec anglers than it does from the comm fishery. It is time to limit by quota the pound net fishery. If you are going to close fishery to rev anglers then close it across the board. You manage our state fishery to keep regular everyday people on the loosing end and continue to keep gear in the water that other states everywhere about has banned. So if we are to have a viable flounder fishery, and they are so overfished and overfishing is occurring, close everyone out. Show some actual want to fix a fishery instead of managing it to benefit certain groups. Or jus keep it how it is. No way are you people trying to fix it.
6/3/2019	Kenneth	Roe III	NC	1																				Ban the gill nets and gigging of flounder. Recreational fishermen have very little to do with the over fishing of flounder.
6/3/2019	Bryan	Stanton	NC	1																				The vast majority of your recreational hook and line fishermen are struggling to catch flounder over the years keeper size that is , which is due to the netting in our waters, I am supremely confident in saying that the recreational anglers aren't even getting an opportunity to make a dent in the flounder population, you should have marine fisheries sitting at the ramps on the weekends and you will see. It is extremely irresponsible to put anymore limits on recreational fishermen at this time and apply Thant further amendmets to the real issue, the netting of undersized flounder is what is killing our stock , that is where you will really solve the problem, if you care more about the fish than you do about the industry , that is where you will make any progress

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6/3/2019	Timmy	Bryant	NC	1																			TO much money passing hands.How can anyone in their right mind claim rec.fisherman do so much harm when you have comm.fisherman literally harvesting anything and everything within range of their nets and for years have been allowed to continue while other states were smart enough to take action with them years ago.The way I see it North Carolina is the laughing stock of the east and gulf coast states and nothing I or other nc sportsman say will change anything.Just like Washington nothing will change until changes are made with leadership offials in NC.
6/3/2019	Tyler	Graybeal	NC	1																			We need to remove gill nets instead of shutting down the fishery to recreational anglers.
6/3/2019	Ben	Thigpen	NC	1																			Simply stop the netting inshore....you know its the answer. Why don't you address the elephant in the room. You've been dodging this for years...we are the only state that allows it on the East Coast.
6/3/2019	Matt	Markley	NC	1																			Gill nets need to be banned or their limits be stringently tightened. It is assured that the recreational rod and reel fisherman is in no way having such a severe impact on the flounder population that they are the cause of such a severe depletion. Commercial net fishing is not only a harm to the overall healthy stock of flounder, but also to many other species such as red drum, trout, black drum and sheepshead to name a few. Gill nets are non-selective fishing gear, and when soaked for 12-24 hours at a time, are detrimental to the bycatch and undersize fish that get caught in them. Recreational rod and reel fishing is 100% selective, and there is very rare chance for undersize kill, unless the rare chance of a deep hooked fish may occur. Furthermore, North Carolina offers poor inshore fishing in comparison to other states with gill net bans, and NC has lost the opportunity to have widespread inshore tournaments with people coming from all over the country due to the gill nets.
6/3/2019	Benjamin	Baldrige	NC	1																			I recreational gig maybe 2-3 times a month. My cousin and I usually go and get our limit which is 4 flounder each. What I don't understand is how recreational fishing even making an impact on southern flounder? Commercial that's a different story. Inshore netting is hurting our fisheries more than any other source. Why not close commercial flounder for 1 season and see what kind of difference it makes. Thank you for allowing me to voice my opinion.

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6/3/2019	Cary	Powers	NC	1																		North Carolina is the only south eastern state that still allows gill nets. The netters in the other states survived , why can't the ones in North Carolina do the same. The commercial matters blame the recreational fishermen for the decline of the fish population and the state politicians believe them. We the recreational fishermen don't have a chance, no one believes us or stands by us. Gill nets need to be permanently banned in North Carolina.
6/3/2019	Johnnie	Smith	NC	1																		We need to ban gill nets that is the main problem.
6/3/2019	Scoti	Rodriguez	NC	1																		The new amendment should not go into effect for recreational gigging and fishing of southern flounder until at the soonest Nov of 2019. Commercial fishing and netting should be stopped immediately until the numbers are acceptable. We Reside in NC and our voice should be put into consideration
6/3/2019	Harold	Reynolds	NC	1																		Stop gill nets...85% of catch from them. Quit pretending to address the issue by halting recreational fisherman.
6/3/2019	Zack	Watters	NC	1																		Instead of closing the season for the recreational flounder fishermen I am a firm believer in starting with the gill netters. That gear is outdated and causes a huge impact on our fishery. Coming from a family that ran gill nets religiously for years I have seen first hand the damage it can do. Not only to the flounder but red drum trout and other inshore/near-shore species.
6/3/2019	Raymond	Rodriguez	NC	1																		Commercial fishing and netting is putting a strain on southern flounder. Recreational fishing and gigging is minimal in comparison. I agree with the current regulations so let's not implement a new amendment until at least 2020. We are one of many families in NC that has a vacation planned this summer which includes a fishing trip. So regulate commercial fishing/netting and leave the recreational fisherman alone this summer
6/3/2019	James	Andrews	NC	1																		I do not support this amendment. It is not fair to close the fishery yet allow gill nets to stay in the water.
6/3/2019	Bryan	Smith	NC	1																		Leave recreation fishing alone and put an end to gill nets. That is where the problem is
6/3/2019	John	Hoard	NC	1																		If closing the Flounder fisheries has been determined to be the only way to stabilize the population, then close it for everyone including commercial gill nets. Thanks
6/3/2019	Dishon	Allen	NC	1																		If regulated it needs to be across the board,not just on the backs of rec anglers.
6/3/2019	Robby	Smith	NC	1																		Gill nets are what is killing our resources. Look no further than the healthy surrounding states without them .

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6/3/2019	Roger	Holt	NC	1																		I am a 1st generation commercial fisherman I am 40 years old have lived in NC my whole life. I decided I wanted to commercial fish to make a living. I have only been fishing this being my 3rd year! I need to see true facts of a decrease in fish! NO FACTS!! I hope this does not pass are it will be another nail in the coffin to end gill net fishing! You see GILL NETS are how I make my money to support my 15 year old daughter and myself! Single father trying to do what God said do in the bible! John 21:6-7 And he said unto them, Cast the net on the right side of the ship, and ye shall find.They cast therefore,and now they were not able to draw it for the multitude of fishes. Therefore that disciple whom Jesus loved said I unto Peter,it is the Lord. Amen!!
6/3/2019	Nick	Wells	NC	1																		Take the gill nets out of the water !!! They are killing all of our fisheries!!!!!!!!!!
6/3/2019	Adam	Edwards	NC	1																		Ban all nets they are killing everything nc must not care to much about are fishery. Also recreational fishing would bring in more money. They are going to make it where no one is going to want to go to the coast to fish. Do a buy out like they did with tobacco
6/3/2019	Michael	Thigpen	NC	1										1							1	Personally I dont support any of your ammendment. You consistently take away more fishing rights from recreational fishermen , but yet do nothing to the ones that are destroying the flounder population. Nets not only get legal size flounder but they kill the undersize as well . They dont only kill flounder but red drum , trout an anything else that gets caught in it . Do I think something needs to be done absolutely, but it needs to be across the board not just the Recs taking the hit.
6/3/2019	Jennifer	Rodriguez	NC	1																		Commercial netting and fishing are the problem! Don't ruin the recreational fishermen's summer.
6/3/2019	Terry	Lee	NC	1																		I'm tired of paying for license to fish and you keep cutting our quota.Yet you let those netting have no limits,it time it stops.So tired off seeing all those dead fish in nets that no one can keep. This has got to stop we should have no more knitting period. They have cut it out in the other States and we need to cut it out to. A lot of my colleagues and I say you are fixing to start a fire, not right and you know it. All we are asking is you be fair about it. Thank you for taking the time to finish reading this.

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6/2/2019	Jan	Willis	NC	1				1						1			1	1	1			
5/24/2019	Rick	Sasser	NC	1					1						1		1	1				While I understand that current management constraints do not allow real-time quotas under Amendment 2, it is imperative that Amendment 2 contain an annual payback quota similar to what is used in the red drum FMP. The Division will know the prior year's harvest by May, which is plenty of time to reduce a sector's upcoming season as a means of payback. I strongly support additional measures to constrain effort such as gillnet yardage restrictions, expanding non-fishing days and less hours. The Director should be given proclamation authority to address unintended consequences of changes in effort. Thank you.
5/24/2019	Lyndia	Sasser	NC	1				1						1		1	1				I am concerned about the unintended consequences of commercial netting efforts changing that will negatively affect the projected seasonal harvest reductions by area. The Commission should consider an annual quota with payback. The Division will have prior year harvest data by April or May. There will be plenty of time to adjust an area's upcoming season to achieve a reduction for a previous year's overage. If adjusting by area is not feasible then an across the board reduction as payback is fair due to the fact that net reel boats are mobile and effort will move from a closed area to an open area. Thank you.	
5/24/2019	Jonathan	Edwards	NC	1			1							1		1	1				I am concerned with the unintended consequence of additional gill netting effort when you break out different areas with different open and close dates. For example, once you close the northern area, effort will increase in the central and southern. Then once the northern and central are closed, the southern area will be hit even harder with nets. I personally believe the largest harvesters (gill and pound nets) should take the largest cuts. The retail value of this recreational fishery is huge. With short recreational seasons, many local businesses from tackle shops, hotels, restaurants, mom and pops, etc. will feel a drastic drop in revenue. There are millions of recreational anglers that travel to the coast for one thing, FLOUNDER! These anglers spend as little as \$20 on a trip all the way up to multiple hundreds of dollars a trip between fuel, vessel, lodging, meals, tackle, etc. When can we join the rest of the east coast and ban inshore gill netting and shrimp trawling?	
5/24/2019	Marc	Boettger	NC	1			1						1				1				I think inshore trawling and inshore gill netting should be banned.	
5/30/2019	sheldon	Montgomery	NC	1		1							1						1			

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5/24/2019	michael	ray	NC	1						1							1	1						
5/24/2019	Carlton	Pittman	NC	1				1								1	1	1						Please ban inshore commercial netting in coastal nursery areas. Too many juvenile species are killed during commercial harvests that never have a chance to reproduce. Please implement a flounder slot limit to protect breeding stocks. Please implement a seasonal closure during spawning times. Please end by-catch fisheries where non-target species are allowed to be harvested and sold commercially.
5/24/2019	John	Matthews	NC	1				1								1	1	1						There needs to be a system in place to reduce commercial netting based on prior year's data. If not not then across the board reduction that would account for a netting boat moving from a closed area to a open area. We remain the only eastern state that allows netting inshore and in nursery areas. I fish in topsail beach and haven't caught a legal flounder inshore the previous 2 years. Anybody from out of state planning a recreational flounder fishing trip would obviously go to another state instead of nc- billions of dollars annually going to other states that properly manage their fisheries resource.
5/24/2019	Christopher	Williams	NC	1			1								1	1	1							Nc needs to conform to the other states and ban netting! Stop coddling this industry.
5/24/2019	David	Rouse	NC	1				1							1	1	1							A partial season during the most likely time to catch these fish in my opinion will simply result in more fish being caught during that time than normal. Granted the short season may (and I emphasize may) reduce overall harvest but I do believe for one second that it will be anywhere near as much as predicted. Boats are going to be out in full force catching as many as possible before time runs out. Closed off areas only push the boats that fish these areas elsewhere. Leave the seasons alone, you would eliminate the mad dash of folks out at once and putting so much stress on the fish in a short time by doing so. Setting a quota would be the only guaranteed way of reducing the number of fish harvested. Fill your quota and you are done. Take an average of several years harvest and subtract 62% and set the quota for that and be done with the take as many as you want rule. And get the dang nets out of our joint waters.
5/24/2019	Hain	Ficken	NC	1				1										1						I am 68 years old and have seen the decline of all our fish. I WAS HOPING TO SEE IT IMPROVE IN MY LIFETIME TO WHERE IT WAS 40 YEARS AGO.. Please support this amendment!!! Hain Ficken

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5/24/2019	John	Bowden	NC	1						1						1		1	1				I have fished and fished consistently in the Cape Fear/Carolina beach area since 2000. I have documented my trips over this period and have absolutely seen the flounder population decimated, whether it be citation fish, keeper size, small fish, total numbers of fish, etc. This is not in question. Whatever it takes we need to sacrifice. Any regulations that allow for the majority of a population of any species, much less flounder to be harvested before they are ever allowed to spawn even 1 time makes no common sense. Allowing trawling in nursery habitat makes no common sense. Please do the right thing so I can take my grandchildren fishing in 10 years.
5/28/2019	Mark	House	NC	1						1												1	
5/24/2019	Benjamin	James	NC	1					1						1				1				Need to eliminate gill nets, pound nets and inshore trawling. Look at the bycatch that destroys many fish species just for the shrimp. Makes no sense. I also think flounder gigging should be looked at. Don't get to shoot deer with spot light why flounder? Stop out of state boats from coming into NC and destroying our resources.
5/24/2019	Stuart	Creighton	NC	1											1		1	1	1				Moving forward, it is critical that the DMF not return to the same management measures as before. If we are going to invest ten years in rebuilding our flounder stock, then we must change the gears that are allowed in the water. Development of Amendment 3 must include a ban on gill nets. There must be strict quotas on both pound nets and gigging that include paybacks for overages. Trawlers in the Pamlico Sound also have juvenile flounder as bycatch to a significant enough degree where they should be removed from this unique nursery area. Recreational anglers should be allowed to keep two fish in a slot length of 14-20" and the use of circle or Kahle hooks should be required of all anglers using live or cut bait. This division MUST change its current management philosophy. Our marine resources are depleted to the point that they can no longer support the status quo. Maximum harvest must be replaced with policies conducive to rebuilding stocks.
5/24/2019	Chuck	Teseneer	NC	1					1						1		1	1	1				
5/24/2019	karen	Montgomery	NC	1		1								1								1	
5/24/2019	Stuart	Davis	NC	1				1							1								
5/24/2019	PHILLIP	WOOD	NC	1				1							1		1	1					Please stop kicking the can down the road or allowing yourselves to be intimidated by a dozen legislators. I am 66 yo and don't have time for this resource to be saved 10 years from now.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019						Seasonal Closure Starting in 2020					Do you support additional non-quantifiable measures?					Comments		
				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None	No Preference			
5/24/2019	Tim	Hergenrader	NC	1				1						1					1	1	1			
5/24/2019	matthew	maddox	NC	1			1							1					1	1	1			I only support a recreational reduction/closure if nets are removed from inshore waters the entire year. Please fix the root of the problem(nets). Commercial fisherman have no more of a "right" to work than I do. Their job shouldnt be protected while nearly every other NC citizens' isn't!
5/24/2019	Joseph	Wright	NC	1				1											1	1	1			
5/24/2019	David	Rose	NC	1				1											1		1			
5/24/2019	Kevin	Dewar	NC	1				1											1	1	1			I am concerned with the unintended consequence of additional gill netting effort when you break out different areas with different open and close dates. For example, once you close the northern area, effort will increase in the central and southern. Then once the northern and central are closed, the southern area will be hit even harder with nets. I personally believe the largest harvesters (gill and pound nets) should take the largest cuts. The retail value of this recreational fishery is huge. With short recreational seasons, many local businesses from tackle shops, hotels, restaurants, local guides, mom and pops, etc will feel a drastic drop in revenue. There are millions of recreational anglers that travel to the coast for one thing, FLOUNDER! These anglers spend as little as \$20 on a trip all the way up to multiple hundreds of dollars a trip between fuel, vessel, lodging, meals, tackle, etc. Let's get like the rest of the east coast!
5/25/2019	Thomas	West	NC	1															1	1	1			I am 59 years old. Use to catch all kinds of fish in the surf and sounds and coastal rivers. Not any more. Nets and shrimp trawlers destroying our sounds and spawning areas in Pamlico Sound. Not nowhere even close to what it use to be. We really need to get these huge steel hull trawlers out of our sounds, and also the trawlers that come from other states because they are NOT allowed to trawl in their internal waters. Its not about the almighty DOLLAR anymore. SOMETHING NEEDS TO CHANGE FOR THE FUTURE OF OUR FISHERIES!!!! Thank you
5/25/2019	Lewis	Williams	NC	1				1											1					
5/25/2019	Bobby	Norris	NC	1															1	1	1			I am concerned that the over harvest of flounder which has been going on for years will never end until the last flounder is harvested. North Carolina could have the greatest fisheries in the nation if it was managed properly and this would be a start.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019					Seasonal Closure Starting in 2020					Do you support additional non-quantifiable measures?					Comments	
				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None		No Preference
5/26/2019	Joseph	Price	NC	1				1						1			1	1	1			The recreational sector has already been restricted at a far more aggressive pace than the commercial sector. The amendment needs to catch up this unbalanced affair and extract the needed reductions primarily from the commercial sector first.
5/25/2019	THOMAS	COLTRAIN	NC	1				1						1			1	1	1			Time for a change in good old NC. Been a long time coming and it is going to be hard on everyone because a few raped NC water for profit. Look at all the other states and see why NC is different. No Gill Nets and Inshore trawling for shrimp. WHY? MONEY -MONEY ! How can we allow boats and fishermen with gill nets to come to NC and do what they can not do in their home states? MONEY STOP IT NOW !
5/25/2019	Charles	Godwin	NC	1				1						1			1	1	1			I fully support the NCMFC Amendment 2. In order to achieve the recommended reductions to end over fishing and replenish flounder stocks, it seems it will take a combination of restraints, such as reductions of gear (such as gill nets), trip limits, and fishing times. I am assuming that fishing times will be a shorter season on the recreational and commercial take of southern flounder. Thank you for the opportunity to voice my opinion.
5/25/2019	William	Divers III	NC	1																		
6/2/2019	Jerry	Dilsaver	NC	1					1					1			1	1	1			
5/26/2019	Christopher	Naff	NC	1																		
5/26/2019	John	William	NC	1						1				1					1			One state supplying 99% of summer flounder to the rest of the country is ridiculous. Even more ridiculous is the use of gill nets. No other state caters to the commercial industry like NC, Since NC cannot lead it is time to follow SC or LA
5/26/2019	Matt	Bowen	NC	1				1						1			1	1	1			we can not continue the circle of "out of sight out of mind". NC has become a laughing stock when it pertains to Management of our Natural Resources. We allow trawling, and netting, both with generate bycatch. We should not settle for "less" bycatch, we need to get to a point where NO bycatch amount is acceptable. We should not be in the business of reducing any "non target" species to gain profit from a "targeted" species. We also need to protect those targeted species to preserve the future stock, the normal operation is to make as much money today as possible, don't worry about tomorrow.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019					Seasonal Closure Starting in 2020					Do you support additional non-quantifiable measures?					Comments	
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5/26/2019	David	Drach	NC	1				1								1	1	1				The changes are great. Just hate to see a season for rec guys. I would be fine dropping to 2 fish all year than having 4 fish during a season. Some of our best flounder fishing happens during July 4th week and if this season takes place there will not be a need to even go to the coast and fish. Atleast with 2 fish you give people the opportunity to catch some fish during a week that is a major boost in the economy of every coastal town in the state. Please give the working people a chance to catch some flounder all year while we are on vacations and long weekends at the beach and fishing towns on the sounds and rivers.
5/27/2019	Robert	Dail	NC	1				1								1	1	1				
5/27/2019	Dale	Madren	NC	1						1						1	1	1				The Commission should consider any measures to account for any unintended consequences that allow commercial fisherman to exceed the expected harvest. Maybe there should be quotas with payback. We should be prepared for the commercial sector to attempt to thwart this critical conservation effort.
5/27/2019	David	Hilton	NC	1												1						I am a pound net fishermen from Ocracoke and I support the AC Advisory Board recommendations. The 31% phase in will end over fishing in two years and the 52% in 2020 will support a robust stock rebuilding plan that allows for the survival of the pound net fishery. Reducing yardage in the large mesh in all regions will reduce by catch mortality but do not support trip limits for pound nets since very difficult to estimate weight when fish are loaded in bins on the vessels. Weather windows also allow for short harvest windows so nets need to be cleared. On my vessel, there is no ability to accurately weigh fish as they come aboard. Even with the 31% phase in, there will be significant fishermen attrition in the pound net fishery and large mesh since fishery will become much less profitable. I believe reductions in harvest will be greater than expected due to regulations. The NCDMF recommendation for 62 and 72% reduction will put the entire pound net fishery out of business!!!!!!!!!!

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019					Seasonal Closure Starting in 2020					Do you support additional non-quantifiable measures?					Comments								
				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None		No Preference							
5/27/2019	Amy	Hilton	NC	1		1								1														I am the wife of David Hilton (pound net fisherman on Ocracoke. Our household depends on commercial fishing to pay the bills. He has invested 20 years of his life building his gear and running a seafood business. He supports changes to the fishery that help it rebuild expeditiously but the current recommendations of 62 % in 2019 and 72% in 2020 will put him out of business. We will have to sell our house and who knows what else. What's the point of this if you drive the entire pound net fishery out of business!! It will force displaced pound net fishermen to move into other stressed fisheries like crabs, large mesh and mackerel. We are both self employed. Fishing income is critical to our economic survival. If you adopt the 62 and 72% reductions you will also put the only fish house out of business and likely the retail. Massive job loss on the island and significant economic pain to many families. Ocracoke Seafood Company payroll is very important to the island!!!!!!	
5/27/2019	terrance	best	NC	1			1								1	1	1												
5/27/2019	Everett	Pesci	NC	1						1					1	1	1												I find it ridiculous that the southern flounder population has been allowed to get so low. we need a FULL commercial harvest moratorium and a year round recreational limit of 2 fish by rod and reel with a moratorium on all giggering. That will get the destructive gear totally out of the water and stop the harvest of the largest females by giggers, while allowing recreational fishermen who accidentally catch a legal sized flounder to keep it rather than throwing it back dead. Stop punishing recreational fishermen for a problem that was entirely created by commercial overharvest of legal fish via gill nets and pound nets, and destruction of small fish by shrimp trawls.
5/28/2019	Jeff	Sampson	NC	1			1								1	1	1												NC must start to conserve our fishery stocks. Past failures and political interference have once again destroyed the fish stocks of NC. Time to rebuild and allow the state to be the fishery it once was which may never happen at this point. Look at herring and Gray trout, spot, croaker all destroyed.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

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				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None	
5/28/2019	Linwood	Gordon	NC	1						1					1		1	1			in management unit E effort for southern flounder from both recreational and commercial fishing is extremely high. These fish cannot stand up to the nightly large mesh gill nets, gigging, spearfishing, and rod/reel fishing. Encountering fish >15 inches inshore has become rare, and it is clear the increased effort has impacted the stock. Another concerning issue is the lack of inshore flounder has forced much effort out to the nearshore reefs, with larger fish being harvested. These offshore fish tend to be a mix of southern and summer flounder, but the average fisherman does not discern between the two. A total moratorium is the best option for the resource.
5/28/2019	Lee	Stone	NC	1						1					1			1			
5/28/2019	Mike	Moody	NC	1											1	1		1			I think these fish could/should be managed with a TAC on the commercial fishery and once it's hit the season closes. Other states have successfully used tags/permits for the recreational sector. As an unformed recreational fisherman, its seems that pound nets keep the fish and untargeted fish alive and would be the best management option. A slot on the recreational section and the encouragement of circle hooks would be very helpful.
5/28/2019	Michael	Collins	NC	1				1							1			1			
5/28/2019	David	Ward	NC	1						1					1	1	1				I am submitting my support for the rather drastic cuts identified above. I am sorry the state of the fishery now requires such deep cuts, but we've waited too long. The North Carolina commercial fishery supplies the majority of all wild caught flounder and we bear a responsibility for our actions in over-fishing the species.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

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				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None		No Preference		
5/29/2019	Boyd	Brown	NC	1						1						1	1	1						Lifetime Carteret County, NC resident. Absent during 25 year military service. Returned to find NC inshore fisheries a depleted disaster. Avid fisherman and caught one keeper Southern flounder in 2018. It is way past time to finally see some action from our regulators. I'm 71 years old and would like to at least have some hope my grandchildren will know what I experienced growing up. I am for a total closure of the Southern flounder fishery and a removal of gill nets and trawlers from inshore waters until the stock becomes viable again. In my opinion, it is criminal that we have reached this point.
5/29/2019	Jamie	Cole	NC	1				1								1	1	1						I believe we need to make these current recommended changes in order to prevent further decline in our flounder fisheries. We have taking small steps for far too long and our stocks have continually decreased over time due to these small measures. If nothing is done now, our future generations will not have the ability to participate or enjoy the fisheries and fish we have grown up with.
5/29/2019	Bruce	Lee	NC	1						1						1	1	1						I support a complete moratorium for recreational and commercial flounder fishing until the flounder population reaches a defined and targeted level. Any and all netting and hook and line take of flounder should cease immediately. This includes any and all net types that would or could potentially take flounder whether intentionally or unintentionally. This would include gill nets, pound nets, and trawler nets in any inshore waters. Gigging should also be included in the moratorium. The results of decades of poor fisheries management practices are evident not only for the flounder population but many other fishes as well. Reduced creel limits, moratoriums, and season limits are just a few of the obvious results of mismanagement. It is long past due that the NCDMF take drastic measures to protect our public resource and increase the fish populations for all. The health of our coastal economy depends on healthy fisheries. It is way past time to fix the damage done.
5/29/2019	Philip	Cornelison	NC	1					1							1	1	1						Please listen to our Marine Fisheries Biologists. This is what we pay them for, to do the research and come up with the optimal solution!
5/29/2019	Jordan	Jernigan	NC	1				1								1	1	1						Establish quota for commercial operations.

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				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None	
5/29/2019	Robert	Rice	NC	1					1						1	1	1				The studies clearly show that the flounder are severely over fished and in serious danger of collapse. Action that should have been taken years ago, but was not, now necessitates drastic measures in order to protect the resource and give it a reasonable chance to recover.
5/29/2019	Gerald	Cessna	NC	1						1					1		1				Additional gear changes should be implemented to prevent bycatch of juvenile fish.
5/29/2019	Christopher	Guill	NC	1						1			1							1	I enjoy fishing for flounder and rarely keep any. I think strict limits on size and numbers should be implemented. Close it all together until a fisherie can be developed
5/29/2019	CA	Pittman	NC	1				1							1	1	1				Please end all commercial inshore netting in nursery areas during any spawning seasons. Please implement a season for flounder to allow all fish to spawn at least once. Please reduce commercial catch limits until the flounder stocks have recovered. Please implement trip ticket limits. Please END by-catch rules that allow non-target species to be kept by commercial fishermen.
5/29/2019	Kevin	Hall	NC	1						1			1		1		1				Our fishery is depleted due to all the nets in our waters. We need drastic measures to revive our fishery just like the Gulf states have done.
5/30/2019	Art	Thinguldstad	NC	1					1						1	1	1				Please do this quickly and effectively
5/30/2019	Len	Rosol	NC	1			1							1			1				The time has come for the gill net to join the whale harpoon as obsolete tools in marine museums. Please eliminate all gill nets from our waters. Pound nets can provide all the flounder that nature can spare, with much less bycatch. Also, please consider moving shrimp trawling OUTSIDE of the sounds to the open ocean. Far too much bycatch.
5/30/2019	Me	IO	NC	1																	
5/30/2019	william	fortune	NC	1			1								1		1				
6/1/2019	Thomas	Newman III	NC	1		1								1	1						Stocks need to be sustainable for the future. But the fisheries needs to remain profitable for the few remaining participants in the flounder fisheries. Rebuild the stocks but allow pound netters enough time to fish and quota to fish to remain profitable during the rebuilding years. If these fishermen are unable to maintain their gear during this rebuilding time; a low dead discard, manageable, and sustainable fisheries will cease to exist in the future. Thank you for your time.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

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6/1/2019	Gregory	Judy	NC	1		1								1														Since the so. flounder has been "overfished" for twenty years, yet it is still going, the DMF should impose the less restrictive options until Amend. 3 is developed. The 31% reduction this fall will allow fishermen the chance to adapt to reduced income in 2019 and prepare for the 52% reduction in 2020. All user groups should shoulder the same amount of reduction while we allow this species to recover. I think that the recovery will happen much faster than predicted by the models since there is some source of so. flounder spawning stock that is currently unidentified. If this were not true then the stock would have already crashed.
6/2/2019	Kenneth	Doyle	NC	1						1					1	1	1											No use of entanglement-gill nets & reductions in pound nets.!
6/3/2019	Patrick	Sasser	NC	1				1							1	1	1										Please take action as recommended by the Division for 62% and 72% harvest reductions in 2019 and 2020 respectively. Please implement measures to constrain fishing effort such as yardage restrictions, limiting days fished and removal of all commercial gears that interact with flounder once the season is closed.	
6/3/2019	Christopher	Elkins	NC	1				1							1	1	1										In Amendment 3, one should favor those gears that are least destructive and have least bycatch. In fact, elimination of large mesh gill nets should be considered. first. Also on the table for Amendment 3 should be quotas. Also the ocean flounder fishery, where a very small percentage of fish are Southern flounder. Why close that fishery during the Southern flounder closed season?. Right now comms can fish in the ocean (without a Federal permit) and I guess during the upcoming closed commercial fishing season. That is neither fair to recreational fishermen. If recs cannot fish in the ocean, comms should not be allowed to as well. I would lke to thank the Division for their hard work on this contentious topic. Especially the staff. Also, I am glad you have this box for "other" comments.	

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

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6/3/2019	David	Beresoff	NC	1		1							1				1								Southern Flounder is very economically for the State and my income. I'm very supportive in maintaining healthy southern flounder stocks. I'm a commercial fisherman in the southern district of our state. My greatest fear is that the State goes to a short season. I use large mesh gill nets. the gear conflict that occurs if the season is short and both gear types compete at the same time the large mesh gill netter will take a beating. Have fishermen declare how they fish. Example Striped Bass Fishery. No double dipping. Open the gear seasons at different times. worst thing in the world in fisheries is to have a Gold Rush mentality. Prices for Southern Flounder are the best they have ever been. Please don't jam all the effort in one short season. Keep the price up and spread out the effort. In area E I'm allowed five nights to fish if I had to go to 2 or 3 nights that would work. Please space out the effort. Tides here do not allow us to fish even on the days we are allowed.	
6/3/2019	Melvin	Albritton	NC	1					1						1			1	1							
6/3/2019	Pete	Stafford	NC	1				1							1			1	1						Remove the nets and ALL stocks will recover. Gig, pound, and hook/line are viable ways to harvest fish	
6/3/2019	Brian	Cobb	NC	1								1					1		1						Its time for NC to stop dodging the issue at hand: the true culprit in NC is rampant gill-netting and inshore trawling. Other states have recognized the damage to both their fisheries and local economies from loss of recreational fisheries and their connections to tourism and local businesses and have reined in destructive gear such as gillnets.	
6/3/2019	Rob	Van houten	NC	1		1							1										1		Gill nets are destroying the states recreatonal fishing. Period. There must be regulations. There is zero accountability and we are destroying our marine fisheries. Please do something before it is too late.	
6/3/2019	Ryan	Dolph	NC	1																						
6/3/2019	Steve	Hutchinson	NC	1									1										1		I think inland netting should be banned! Stocks are down due to commercial netting not from recreational anglers. Wake up Marine Fisheries!	
6/3/2019	John	Gavigan	NC	1		1																	1		Need to get rid of the netting or drastically reduce their limit and drastically increase the oversight to prevent killing small fish and the wrong species. I've seen it first hand and it is out of control and a terrible mismanagement of our states natural resource for profit by only a few. Absolutely shameful.	

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6/3/2019	Kenneth	Freeman	NC	1										1											It is a shame that NC is the only state left that still allows nets for commercial fishing. I am 26 year old that loves to fish and was raised fishing. It saddens me to see a decrease in the number of fish over the years and yet the only ones to pay the price are the ones trying to catch them hook and line. My family and I used to could catch our limit of fish no problem and then always enjoyed having a fish fry for the whole crowd. Now it's like we have a hard time finding good fish and when we do we can only keep enough to barley feed ourselves. I believe NC has great potential to have an awesome fishery. I vote to to take the nets out of the water. And if it comes down to money, just look at the money that comes in on the recreational side vs the commercial side. It is time to jump on board like our surrounding waters that has great fisheries. Take the nets out of the water.
6/3/2019	Darryl	Price	NC	1				1																	Get rid of the gill nets and trawlers inshore and the problem will fix itself!
6/3/2019	Steffen	Schollaert	NC	1		1						1													Ban gill nets.. should be illegal as it promotes decimation of vital ecosystems.
6/3/2019	John	Tedder	NC	1																					
6/3/2019	Jim	Ingraham	NC	1			1					1				1									Until you outlaw gill nets nothing will get better. It should be common sense that wanton waste and destruction from gill nets has no place in the modern fisheries management landscape, but as history has proven time and again real action to protect resources held in public trust usually isn't taken until the situation is truly dire and recovery uncertain. I hope that this commission will break from history's model, separate the politics from the reality of this issue and take immediate action to halt the use of commercial gears that destroy so much for such minimal gain to a select few. There was a time when market hunting ducks on the Chesapeake fell under the loophole of Heritage, but eventually rational minds determined this must be stopped regardless of the cultural implications. Those market hunters adapted to the new order of things and were able to find less destructive sources of income; please do the right thing here and send gill nets the way of the punt guns.
6/3/2019	Michael	Cisneros	NC	1																					
6/3/2019	Thomas	Roller	NC	1												1	1	1							This fishery is in dire shape and needs immediate emergency measures to curtail harvest, The sustainable commercial gears, pound nets and gigs, should be given less of a reduction while the unsustainable and dirty large mesh gill fishery should bear the brunt of the reductions and should be entirely closed.

Appendix 3. Public Comment received via online option on Southern Flounder FMP Amendment 2 (6/4/2019)

Submission Time	First Name	Last Name	State	Support Am. 2?		Seasonal Closure in 2019					Seasonal Closure Starting in 2020			Do you support additional non-quantifiable measures?				Comments				
				Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits		Fishing Times	Gear Changes	None	No Preference
Totals:				91	150	8	9	34	11	20	7	14	10	39	19	6	59	50	74	5	5	195
Submission Time	First Name	Last Name	State	Yes	No	Option A (31%)	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Option B (52%)	Option C (62%)	Option D (72%)	Option E (Partial moratorium)	No Preference	Trip Limits	Fishing Times	Gear Changes	None	No Preference	Comments

FOOTNOTES

3 instances of two entries with the same first and last name.

3 instances of apparent fake first and last name.

6 instances of entries indicating support of amendment 2 but did not pick any options.

4 instances of entries with no name, 1 in support and 3 opposed. No additional comments were included.

