



North Carolina Wildlife Federation

Affiliated with the National Wildlife Federation

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May 9, 2018

Dear Commissioners,

On August 17, 2017, the Marine Fisheries Commission voted to expedite the revision of the Shrimp Fishery Management Plan (“FMP”) to begin as soon as the three-year Shrimp Bycatch Reduction Industry Workgroup study was complete and no later than February 2018.¹ The Commission took this action in order to move forward the FMP process and proposed rules included in the petition for rulemaking approved by the Commission in February 2017 on parallel tracks.

The Shrimp Bycatch Reduction Industry Workgroup completed their study, and the Commission is expected to consider the Workgroup’s recommendations at this week’s meeting. The Workgroup’s study examined only the use of additional bycatch reduction devices; it did not address the full suite of management strategies proposed by the petition for rulemaking.

In approving the expedited revision, the Commission recognized the urgent need to address shrimp trawl bycatch and protect juvenile fish in our sounds and offshore. Commission must not further delay the revision of the Shrimp FMP.² Shrimp trawl bycatch remains a critical issue that must be addressed by the Commission. Despite years of scientific consensus that management changes in the shrimp fishery are needed, the Commission’s adoption of the N.C. Wildlife Federation’s petition was the first time that the Commission took clear action required by science and the law. Amendment 1 to the Shrimp FMP was merely a plan to study a well-established problem rather than require any change. Now that the problem has been studied, it is time to start implementing proactive measures to protect juvenile fish in our sounds and off our shores.

¹ See Marine Fisheries Commission Business Meeting Minutes (Aug. 16-17, 2017), http://portal.ncdenr.org/c/document_library/get_file?p_l_id=1169848&folderId=31095915&name=DLFE-135133.pdf. The language of the motion, as reported in the minutes for the meeting, reads as follows: “Motion by Chuck Laughridge to amend the Rose motion to place in the following order these FMPs: Southern Flounder, to begin as soon as the peer reviewed stock assessment is completed; Estuarine Striped Bass, to pursue this FMP no earlier than 2019, assuming a supplement requested by the MFC is in place addressing issues in the Central-Southern Management Area; Blue Crab, to begin as scheduled, Spotted Seatrout, to begin in 2019- 2020; Shrimp, to begin as soon as the three-year study is complete, and no later than February 2018. All other FMPs as presented by the NCDMF.”

² Division of Marine Fisheries staff recommend delaying the revision of the Shrimp FMP, and focusing the Commission’s attention exclusively on the recommendations of the Workgroup. See Memorandum from Chris Stewart, et al., Div. of Marine Fisheries, to Marine Fisheries Comm’n (May 16, 2018) at 451 of Briefing Book, http://portal.ncdenr.org/c/document_library/get_file?p_l_id=1169848&folderId=31782504&name=DLFE-138032.pdf.

Sincerely,

A handwritten signature in black ink that reads "Tim Gestwicki". The signature is written in a cursive style with a large, sweeping initial "T".

Tim Gestwicki
Chief Executive Officer
North Carolina Wildlife Federation

CC: Steve Murphey, Director, N.C. Division of Marine Fisheries
Phillip Reynolds, Legal Counsel to N.C. Marine Fisheries Commission
Nancy Fish, Division of Marine Fisheries Liaison to the Marine Fisheries Commission