

NC Marine Fisheries Commission

Public Comment

May 2024 Business Meeting

**Written
Public
Comment**

Date	Name	State	Comments
2024-05-10 20:39:29	THOMAS COLTRAIN	North Carolina	<p>I see no reason at all for anyone to keep trout over 24 inches. Let the big females live and spawn to further protect this fishery. The slot limit is great but go don't kill fish over 24 for a piece if paper or picture on social media or a tournament.</p> <p>To protect the sea grass get the shrimp trawlers out of the sound and not only will the grass come back but so will flounder,gray trout,spots croakers make a return.</p>
2024-05-13 13:18:47	Drew Starling	North Carolina	<p>This closure will affect my ability to make a living on the water. Iam against any closure for fishing or shrimp.</p>
2024-05-14 07:46:59	Mac Currin	North Carolina	<p>Regarding the Striped Mullet FMP.</p> <p>Time area closures are rarely effective means of reducing harvest unless they are significant. Fishermen are adaptable and simply increase effort during the open days to compensate for the weekend closure. You only need to look at past examples in NC to see that.</p> <p>Re: Trawling in SAV.</p> <p>SAV has been identified as critical habitat in the CHPP. Losses of this habitat have been massive through the years. How can we not prohibit all bottom disturbing gear from being used in these areas? If you do not prohibit trawling in SAV, then you might as well toss the CHPP in the dumpster.</p> <p>Re: Mandatory Reporting.</p> <p>I am in favor of collecting useful and meaningful data to better manage our fisheries and as a recreational angler, happy to provide useful data. This program, as designed, will not give managers the information that will better the estimates of harvest by either sector. Discards, especially in the commercial sector, but also in the recreational sector, are a large hole that must be filled.</p>
2024-05-14 08:08:14	Bob Dillard	North Carolina	<p>Blue crab decline: I have been a recreational Blue crabber all my life (76 years). While I believe Blue crab commercial fishing has been over crabbed for decades, I believe the dramatic decline of Blue crabs is due to a rise in water temperature (climate change). I recommend that a scientific study be commissioned to compare water temperature to crab catch. My personal experience is in the sound at south Topsail Island (76 years) and in the Neuse river and its creeks near Oriental, NC. Both areas have seen significant declines in Blue crab production. Both areas are also shallow waters with higher temperatures than the surrounding Atlantic.</p> <p>Recreational Fish Catch Reporting: I believe this regulation will be so unenforceable as to make the data worthless. The majority of recreational fishermen will not submit their catch statistics given the minute numbers of personal catch vs the total fish species catch.</p>

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2024-05-15 10:17:48	Chris McCaffity	North Carolina	Please think about shifting management priorities away from wasteful closures and regulatory discards to focus on using proven management tools that enhance our fisheries, freedom, and food supply. Wise use of hatcheries and habitat enhancements can be the perfect blend of wild-caught seafood and public water aquaculture that benefits everyone and the environment. Does anyone have a better idea that would sustainably support more recreational opportunities and seafood production while generating new revenue by creating commodities? It is time to recognize that habitat degradation negatively impacts spawning success for many species, and we have the ability to help nature overcome these obstacles so stocks can thrive at historically high levels while allowing more harvest.
2024-05-15 18:52:22	Stancil Lilley	North Carolina	Concerning Crab population and over harvesting. If you want to sustain the crab population you STOP harvesting FEMALE crabs. When you remove the females you're removing the source that produces eggs and baby crabs. My grandfather and his 2 brothers were from Lowland and worked on the water. They would never keep the females. STOP harvesting the females, males don't produce eggs. Get the trawlers out of rivers and breeding grounds. Those areas should be pots only!
2024-05-16 08:46:20	Matt Glancy	North Carolina	I wanted to go on record to show my disapproval of all proposals brought forward which would close or further restrict areas open to trawling throughout the NC coast. Areas I shrimp in core sound and straits would be completely shut down if the proposed closures were to take place. The argument of increased sedimentation caused by trawlers is a joke when you look at what a single hard blow will do to the waters in our area any particular time of the year. If environmental concern is truly the agenda here then lets look at the real issues like coastal development which cause habitat destruction to wetlands and coastal forest as well as harmful chemical runoff just for the sake of having a pretty lawn. Also I'm not saying that dredging is a bad thing but how many grass beds were destroyed in the recent dredging of the drain leading to cape lookout. There is also an article in the News times today where the Emerald Isle commissioners have been trying to dredge a new channel for several yrs but the proposed route has the presence of a lot of seagrass so they were unable to get the necessary grants and permits. Now they have voted to ask for assistance from the state legislators to get this approved...What a joke and slap in the face to everyone that's against this trawling closure.
2024-05-16 17:03:26	David Sneed	North Carolina	<p>May 16, 2024 CCA NC PUBLIC COMMENTS - NC MARINE FISHERIES COMMISSION MEETING, MAY 22-24, 2024</p> <p>CCA NC COMMENTS ON BLUE CRAB ADAPTIVE MANAGEMENT Regardless of the availability of management advice from an updated stock assessment, stock concerns raised by commercial crabbers and trends in available data clearly show Amendment 3 management measures have not worked to reverse declining population trends as intended. Amendment 3 adopted management measures were only projected to result in a 2.4% harvest reduction with a 50% probability of achieving sustainable</p>

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			<p>harvest, the minimum required by statute.</p> <p>All available information suggests the blue crab stock has continued to decline since adoption of Amendment 3 management measures in February 2020. The Amendment 3 adaptive management framework will be used to immediately address the overall declining trends in the blue crab stock.</p> <p>Blue crab is a common pool, public natural resource owned by all citizens. Yet it has always been managed by the State not just primarily, but exclusively, as a commercial fishery, with virtually zero consideration given to citizen, not-for-profit harvest of blue crab. Public access to harvestable coastal fish stocks is almost always a direct function of stock abundance, and the State’s allowance of commercial overharvest of blue crab has reduced its abundance to historic lows.</p> <p>So, the Division will now use the Amendment 3 adaptive management framework that “allows any quantifiable management measure, including those not discussed in Amendment 3, that has the ability to achieve sustainable harvest either on its own or in combination to be considered” to address the overall declining trends in blue crab stock.</p> <p>“Prior to implementation, the division will consult with the Northern, Southern, and Shellfish/Crustacean advisory committees and management recommendations will be brought to the MFC for approval.” So, back to the same advisory committees dominated by the very commercial industry representatives they are trying to manage. How will citizen, not-for-profit harvest of blue crab be considered? Blue crabs are too important to our ecosystem, and it is past time to reverse the commercial overharvest of this public trust resource.</p> <p>CCA NC COMMENTS ON PROTECTING SAV WITH SHRIMP TRAWL CLOSURE AREAS</p> <p>At the last MFC meeting, Chris Stewart gave a PowerPoint presentation discussing the protection of critical sea grass habitat through a shrimp trawl area closures issue paper. This presentation included the N.C. Division of Marine Fisheries (DMF) and Habitat and Water Quality Advisory Committee (AC) recommendations to the N.C. Marine Fisheries Commission (MFC) in support of Shrimp Fishery Management Plan (FMP) Amendment 2 implementation. This Division recommendation for the closure of additional areas to shrimp trawling resulted from an MFC selected management strategy within the Shrimp FMP Amendment 2 charging “That the Division of Marine Fisheries collaborate with the Coastal Habitat Protection Plan (CHPP) support staff and the Habitat and Water Quality Advisory Committee on issues related to SAV habitat. As the Division deems appropriate and feasible, actions to address that impact will be identified by the appropriate committees and brought to the MFC in the future for action as part of adaptive fisheries management with the collaboration of stakeholder groups and their advisory committees.”</p> <p>SAV and SAV habitat are federally designated as Essential Fish Habitat and Habitat Areas of Particular</p>

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			<p>Concern. Its ecological functions include providing refuge, forage, spawning and nursery areas for many species. It provides sediment and shoreline stabilization, and improves water quality, primary and secondary productivity, nutrient cycling, and carbon sequestration.</p> <p>The MFC deferred any action on this until input from the standing Advisory Committees (Acs) was provided. As expected, their input was heavily influenced by the commercial sector and their recommendations were unanimously in favor of doing nothing as it would hurt shrimpers in the proposed closure areas.</p> <p>The legislative goal of the NC Coastal Habitat Protection Plan (CHPP) is the long-term enhancement of coastal fisheries associated with coastal habitats. Each division was charged with developing implementation actions that address the goals and recommendations of the CHPP. The responsibility to identify and delineate strategic coastal habitats and enhance and protect these habitats from adverse physical impacts, are clearly the responsibility of the NC DMF and MFC. Concerns raised about other water quality issues or coastal development fall to other agencies to address. Given this charge, it is hard to fathom the MFC not prohibiting bottom disturbing gear in any SAV beds. The Habitat and Water Quality Advisory Committee has already endorsed this plan.</p> <p>In 2020, the Albemarle-Pamlico National Estuary Partnership (APNEP) and NC DMF convened a technical workshop to develop water quality strategies to protect and restore submerged aquatic vegetation. Dr. Jud Kenworthy, retired Research Biologist with the NOAA Beaufort Lab and leader of the APNEP SAV Team, presented on the extent and status of SAV in North Carolina. Some of his comments from four years ago should resonate loudly with the MFC today:</p> <p>"The question is not what is the SAV crisis in North Carolina but rather how do we avoid the crisis. And the second question is why are the lights getting dimmer for some parts of our resource?"</p> <p>"This data represents an urgent opportunity, particularly with the ongoing effort to develop numeric nutrient criteria, to start making progress on water quality improvements to benefit SAV before it is too late."</p> <p>" Restoring SAV is challenging, particularly at an ecosystem level. Not only is it expensive, but a recent metanalysis suggests it is highly uncertain, with only a 36% probability that SAV restoration will be successful. Taking steps now to protect North Carolina's SAV is key to limiting the difficulties associated with any necessary restoration in the future."</p> <p>Trawls and dredges will destroy the modest gains we have made in SAV coverage. Every effort should be made to locate SAV beds and to keep towed gear out.</p>

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			<p>CCA NC COMMENTS ON STRIPED MULLET FMP AMENDMENT</p> <p>The Commission is expected to take a final vote on the Striped Mullet FMP. The 2022 stock assessment indicated the striped mullet stock is overfished and overfishing is occurring. The North Carolina Fishery Reform Act of 1997 requires the State to implement management to end overfishing and to achieve a sustainable harvest within a 10-year time period. To achieve sustainable harvest within this time frame, management measures estimated to achieve a 20—33% reduction in total removals from 2019 landings are required. At their February meeting, the Commission selected weekend closures for the commercial harvest and a reduction in the bag limit for recreational anglers from 200 fish to 100 fish as their preferred management options. While the weekend closures are estimated to achieve a 34.9% reduction in harvest, no one really believes the weekend closures will reduce harvest by the needed amount. Compensatory fishing during the week will see to that. The MFC would be wise to reject the current management options as they will not do enough to end overfishing and begin to rebuild the stock to sustainable harvest levels.</p> <p>The MFC should reconsider a seasonal closure to protect the fish as they move offshore to spawn. While they are targeted by roe fishermen during this time, they represent the future of this fishery and why a roe fishery is not sustainable in itself. The MFC should consider how a seasonal striped mullet closure would work with discussions by the Spotted Seatrout FMP AC on a seasonal closure for commercial harvest of trout.</p> <p>CCA NC COMMENTS ON ATLANTIC BONITO</p> <p>At the February MFC meeting, Commissioner Tom Roller raised concerns about the increased pressure on Atlantic bonito in North Carolina waters and asked Division staff to come back to the May meeting with some information on landings trends and a possible discussion on setting bag limits on harvest. The Division included this request in its “Meeting Assignments and Preview of Agenda Items for Next Meeting” as an action item – “The Division will look at Atlantic Bonito landings and the potential for recreational bag limits.” However, this action item is not on the agenda for discussion at the May meeting.</p> <p>Our members, who include active anglers and for-hire guides, often notice trends taking place in our fisheries that researchers and fisheries managers may not be aware of yet. While this has long been a popular spring fishery for a select group of anglers, CCA NC has noticed an increase in the targeting, and harvest, of Atlantic bonito by anglers as we continue fishing down the food chain in North Carolina. There are currently no harvest limits on Atlantic bonito and the social media posts of recent activity highlight the increasing number of anglers landing boatloads of these fish. There is also the potential for the development of a commercial fishery as has happened in Florida. The West Palm Beach Fishing Club recently sent a letter to the Florida Fish & Wildlife Commission (FFWC) and the National Marine Fisheries Service (NMFS) to make them aware of what they view as an “emerging issue of concern” in Florida waters. In recent years they</p>

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			<p>have seen a notable decline in the local abundance of bonito and urge both the FFWC and NMFS to further investigate this issue and consider management of Atlantic bonito. We are calling on DMF to get out in front of this fishery before we start seeing declines in local abundance in North Carolina.</p> <p>As stocks have declined and harvest seasons have contracted on traditionally popular species, public anglers will continue to shift their attention to other target species that are currently unmanaged. The same will be true for the commercial fleet which is compelled to move on to the next alternative, but less desirable species, due to the economic availability.</p> <p>CCA NC supports the call from public anglers in Florida for management of Atlantic bonito and urges the NC Division of Marine Fisheries to once again be a leader in managing this valuable fishery, as they did with false albacore, to prevent overfishing from occurring and not just react when a problem develops.</p>
2024-05-20 11:49:02	Zachary Davis	North Carolina	<p>Hi my name is Zack Davis, I am a part time shrimper from Carteret County. I will start by saying I am in complete opposition to the advisory committee's recommendation for Shrimp FMP Amendment 2 trawl closures. The lack of data justifying these vast closures has been skewed against the commercial fishing sector. When digging into the issuance papers given by the DMF there are many flaws in the data collected and used by the advisory committee. There was NO input from anyone familiar with the proposed area closures. NO communication as to what would be beneficial but also manageable to the habitat as well as the fishing industry. What I see happening is a systematic agenda being pushed over the past decade to eliminate trawls and gill nets.</p> <p>The recommendations put forward include drastic closures that are unjustified, the scientific data and statistics of SAV in Closed and Open bottom PROVE that trawling is not the issue causing reductions in SAV.</p> <p>The SSNA designation shift to PNA is not necessary. The DMF has the option to keep these areas closed to trawling if the need is necessary. None of these areas MUST be opened to trawling. However, these areas MAY be opened if certain environmental factors arise which would justify the decision. For instance, an abundant crop of large shrimp with an impending hurricane..... Furthermore, this decision has already been put forward for 5 bays and river areas that have historically remained closed over long periods of time. The only thing this proposal does in the long run has nothing to do with trawling. The change to PNA would eliminate gill nets in these areas for another two months out of the year. It changes the gill net laws from ending in September 30th to November. Again, this change does NOTHING to change trawling potential closures from the DMF but it does eliminate gill nets, notice the Agenda.</p> <p>The SAV area closures are not needed in my mind as a shrimper. Personally I do not trawl across these areas because I do not want to catch grass. I do not know of any captains that do not share this same mentality. However, if the DMF desires to alter these current boundary lines I feel that local fisherman input is essential. There are areas that are currently open to trawling that are not used by local fishermen but the recommended</p>

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			<p>closures go far beyond the actual SAV areas given in the Images compiled by the DMF which included the SAV.</p> <p>I feel that the advisory committee as well as the Fisheries Commission has failed to account for the current trend in the fishing industry. The industry, as a whole, has been in decline for the past 20 years. Though the remaining industry remains a very strong and vital role in the economy of eastern NC, it is a known fact that participants have been in a steady decline. I feel this is an important aspect as to the current issue, Using the fisheries statistics given in the issuance papers over a 5 year average from 1994 to 1999 compared to the past 5 years here are the facts.</p> <p>Statewide from 1995 to 2019 trips have decrease by 75% and participants have decrease by 65%</p> <p>Pamlico Sound decreased in trips 23% and participants 20%</p> <p>The areas from Core Sound to White Oak decreased by Trips 82%, Participants 70%</p> <p>When comparing the highest year of 1995 to the Latest year on data 2019</p> <p>All reductions</p> <p>Pamlico sound: Trips 65%, Participants 44%</p> <p>Neuse River Trips 70%, Participants 60%</p> <p>Bay River trips 95%, Participants 80%</p> <p>Pamlico/Pungo River trips 80%, Participants 90%</p> <p>When Comparing APNEP data for open and closed areas in lower core sound from the 1980s map datum to the 2013-2021 map datum the reduction in SAV was 67% on overage in open trawl bottom and 71% on average in closed trawl areas. When looking at reduction in SAV in the rivers and tributaries the percentages of reduced SAV acreage ranged from 80-90% over the past decade (all in closed trawling areas). This data was collected and analyzed by the states lead SAV biologist team, headed by Judd Kenworthy and Presented at the Water Quality Workshop through the CHPP program. Trawling is obviously NOT the problem.</p> <p>My question is when is enough, enough? What is the Commission looking for in these areas? Total elimination seems to be their only mindset, as 80-90% reductions have not been satisfying.</p> <p>This also points to whether stocks of finfish are even in question of being reduced. As stock assessments for most species involved are based off of trip landing data. It seems that looking at trip and participant reductions should be taken into account as a comparable percentage of expected landing reductions over the long term data recording for stocks.</p> <p>Also I feel that the Stripped mullet management plan is absolutely unnecessary. The DMF has left out landing statistics from the past 4 years so that the stock assessment numbers show a skewed harvest record. The mullet populations are as good as they've ever been and to cut both recreational and commercial fishermen</p>

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			<p>out of this valuable state wide fish is nonsense. This is simply a weekend gill net ban that had to have recreational impacts as well to pacify the commercial closures. The enforcement is going to be a nightmare, the recreation use of the fish as bait should be allowed anytime of year, and the commercial harvest should also be allowed any time of year. To regulate this fishery is completely unnecessary.</p> <p>The end result of these closures does nothing more than put the small vessels and recreational fisherman out of business. These fishermen do not have the vessels with the fuel and ice capacity to go into the open ocean or Pamlico Sound even if the weather was permitting. Furthermore, when forced to fish these areas as a last resort of earning a livelihood, they will be potentially putting lives at risk putting their vessels in areas they have no business being in.</p> <p>As a citizen of North Carolina I expect the Fisheries management decisions to be based on sound scientific data that supports all user groups without the exclusion of others. This proposal is nothing short of a partial net ban for internal waters in NC.</p> <p>Thank you Zack Davis Marshallberg, NC</p>
2024-05-20 13:56:00	Thomas Newman	North Carolina	<p>I am a full time commercial fisherman and a part time employee at NCFA and I want to comment on the “Vote on Final Adoption of Amendment 2 to the Striped Mullet FMP”.</p> <p>You the MFC voted in good conscience for a commercial harvest closure on Saturdays and Sundays year round with an additional Monday closure during the roe mullet season at your February meeting.</p> <p>You the DMF updated the draft striped mullet Amendment 2 FMP paper with a small paragraph adding to this an additional 12 hours weekly to the closure time yet did not openly discuss or presented this as part of management option 5n to the MFC or the public during the February MFC meeting.</p> <p>Shame on the DMF for not being open and hiding this. No wonder the public has trust issues with this system. It is beyond broken. I was fully involved with this process from the Striped Mullet AC to the Northern AC and I attend and listen multiple times to every MFC meeting. Yet I did not know of this additional closure until the meeting materials were released for this meeting.</p> <p>MFC, please vote this down. This is not what you initially voted for and it is not what the public was told you voted for. This is an extremely wrong and sad decision on the part of DMF and I hope you all will do the right thing and unwrought the injustice that DMF is trying to impose on commercial fishermen.</p>

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			Thank you, Thomas Newman
2024-05-20 15:24:36	Robert Huntley		The new recreational fish reporting rule seems to be an ill thought out law. I have high hopes that this will be repealed and replaced with a more reliable source of catch data than NOAA might provide. If the purpose of this law is to collect fines from recreational fishermen, then you will have accomplished your goal, as I have heard much talk of civil disobedience.



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16 May 2024

The North Carolina Wildlife Federation (NCWF) submits the following comments on the proposal to expand submerged aquatic vegetation (SAV) habitat protection through various bottom trawling closures. In support, we cite the information presented by North Carolina Division of Marine Fisheries (DMF) staff to the North Carolina Marine Fisheries Commission's (MFC) Habitat and Water Quality Advisory Committee at the Advisory Committee's January 17, 2024, meeting. During that presentation, staff reviewed the ecosystem functions provided by SAV, its benefit to North Carolina's economy, and the negative impacts that bottom-disturbing gear can cause to SAV. Staff noted that trawling has been documented to shear, cut, or bury SAV leaves, flowers, or seeds, increase turbidity and sedimentation, disrupt ecosystem food webs, and reduce habitat complexity. The available science is consistent with this position. Further, it is well-established that shrimp trawl bycatch is the leading cause of fish mortality for many important commercial and recreational fish species, especially when trawling occurs in estuarine nursery habitats. North Carolina remains the last state on the Atlantic Coast that allows this devastating trawling of inshore estuarine waters.

The January 31, 2024, issue paper developed by DMF staff in collaboration with Coastal Habitat Protection Plan (CHPP) support staff looked at specific locations where areas open to trawling overlapped with documented SAV habitat and reviewed the management options for each region. In Regions 1 and 9, staff determined that no further management was needed. Management options in Region 2 included prohibiting trawling on a portion of the western edge of Roanoke Island from Weir Point to the Manns Harbor Bridge, and limiting trawling to the main channel (100 ft to either side of the Roanoke Channel). For Region 3, the management option included prohibiting trawling year-round in designated pot areas of the Pamlico, Bay, and Neuse Rivers. For Region 4, the option included creating and expanding closures along a portion of the western shoreline of Dare and Hyde counties. For Region 5, the options included limiting trawling to the main channel plus 100 ft to either side, prohibiting trawling along a portion of the western shoreline of Roanoke Island, and modifying the existing trawl net prohibited area to include portions of the western shoreline behind Salvo and Buxton Harbor. The option for Region 6 included prohibiting trawling in Core Sound and its tributaries, except in the Mechanical Clam Harvest Area. Options for Region 7 included prohibiting trawling in the Straits, Back Sound, and their tributaries, modifying or creating shrimp trawl closure lines in the North and Newport Rivers. The NCWF fully supports these recommendations.

At the Advisory Committee meeting, members of the shrimp trawl industry claimed that trawling can actually reduce sedimentation, and the boats used are small with low impacts, citing a thesis that suggested that shrimp trawling was not negatively impacting the SAV. DMF responded that they had reviewed the thesis and found it to be inconclusive for several reasons as noted in Amendment 1 to the Shrimp Fishery Management Plan. None of the claims that suggest shrimp trawling has little impact or is even good for the habitat and ecosystem are supported in the peer-reviewed literature or can offset the catastrophic losses shrimp trawling in the estuary creates. Objections to protecting historical SAV locations are economic for a minute fraction of North Carolinians. While the absolute recovery of SAV in all areas cannot be determined, there is 100% certainty that SAV will not be restored in areas where trawling continues, regardless of the size of the boats. Maximum protection of SAV, as explained by

DMF staff, is in the best interest of our public trust marine resources. Furthermore, SAV in North Carolina stores the equivalent of 18 million metric tons of carbon dioxide, and the protection and restoration of SAV is consistent with Governor Cooper's Executive Order to Protect and Restore North Carolina's Critical Natural and Working Lands (E.O. 305) (Feb. 12, 2024).

The MFC approved the options to take the issue out for further public comment. The MFC chair of the Habitat and Water Quality Advisory Committee made a compelling science-based argument for protecting these critical habitat areas. Unfortunately, other commissioners argued that boat props were more damaging and asked why the state would close areas too deep for grass to grow. One commissioner suggested this action would be "mega disastrous" if folks from all over the country could not trawl for shrimp with a charter in the grass beds off Roanoke Island. It is disturbing to us that commissioners raise arguments unsubstantiated by science to argue against buffers that would protect SAV areas from vessels fishing right up to the grass. We request that the unsupported statements made by commissioners regarding prop damage either be clarified by available science or discounted by the DMF. While we consider the management options recommended by DMF to be the minimum steps necessary to begin to offset the impacts of decades of shrimp trawling, we support them fully.

It is unclear, however, how restoration of SAV habitats might help severely depressed fisheries stocks. This problem was addressed in the petitions for rulemaking submitted by the NCWF for shrimp trawling reform in 2016 and 2018, one of which was approved by the MFC but was indefinitely stalled by DMF. The fact that North Carolina remains the sole bastion for trawling in estuarine nursery habitats, which include potential SAV meadows, is a public tragedy. Removing all trawling in estuarine nursery areas that include all of Pamlico and Core Sounds will eliminate that destructive activity and greatly enhance our collective efforts to restore and enhance SAV and oyster and live bottom habitats, as well as reduce turbidity and the introduction of toxins into the water column. The current value of our devastated marine resources would improve exponentially, benefiting all North Carolinians, our sister states to the north and south, and our marine ecosystem. Despite this, many fishermen have compared shrimp trawling to plowing fields and hurricanes and have suggested that trawling may improve short-term productivity of the estuary. These claims critically fail to account, however, for the fact that shrimp trawling occurs almost daily over many months. Daily hurricanes or plowing would render the coastline and affected fields as devastated as our estuarine nursery grounds.

The NCWF remains in full support of moving all shrimp trawl activity into the Atlantic Ocean and promoting the many other sustainable methods for harvesting shrimp in the estuary such as channel nets and skimmer trawls. The benefits to our collective marine resources and associated ecosystems are a responsible and precautionary approach that would yield valuable results. DMF's track record for success is, unfortunately, not applaudable. It is past time to refute the argument that North Carolina is "different" and follow the leaders, all other South Atlantic states, with proactive conservation management.

Sincerely,



Tim Gestwicki
CEO
NC Wildlife Federation

Good afternoon everyone,

I would like to submit these comments ahead of next week's MFC meeting. As my history dictates, I tend to go longer than my three minutes allow, and I wanted to submit this part to give you a chance to review them in their entirety.

In addition to what is listed, I would like to support taking a look at establishing some management guide rails on: sheepshead, black drum, and bonito. Pressure on these species will only increase both commercially and in the public sector as restrictions on other finfish continue to increase.

Thanks,
Stuart Creighton
CCA Fisheries Committee Chairman

IT IS TIME FOR SOMETHING DIFFERENT

For nearly three decades, North Carolina has managed its marine and estuarine resources under the auspices of the Fisheries Reform Act. It sets forth a series of policies and regulations that are overly cumbersome, inflexible, and inefficient. By design, changes needed to modify the base FMP take an average of 3-5 years to enact. And no matter what those changes need to be, a politically appointed MFC can undo those years of work on a whim.

Because we are mandated to manage our fisheries resources through separate FMPs, too many problems slip through the cracks, too many issues can be purposely ignored. All the while, we continue to watch species after species fall into decline. A few examples follow:

→ From the speckled trout FMP, it is noted that small mesh gill nets are very effective at removing 14" trout, with very few speckled trout discarded as bycatch. Because of this, the commercial industry claims that this is a clean, selective gear and that they should be given a greater share of the fishery because they will fish it more effectively than public anglers will. What isn't mentioned or considered in developing future management measures for speckled trout is the effectiveness that those same nets have when it comes to removing 14" (sublegal), striped bass and red drum. Rather than be allowed to recruit to their respective fisheries, these fish are discarded and left to serve as fodder for scavengers. In addition, the mullet fishery is closely tied to the speckled trout fishery, with each species being listed as the primary incidental catch for the other. If mullet fishermen catch trout and trout fishermen catch mullet, then the two species should co-managed to mitigate the bycatch losses that the coming restrictions in each amendment to each FMP will generate. In other words, gill net restrictions in one fishery should be applied to both fisheries.

→ When it comes to striped bass in NC, we commonly hear, "It's all about flow." Clearly, it isn't as good flow rates in the ASMA for the past five years have led to nothing but failed spawns. The real issues are: (a) a lack of big fish, the best spawners, which DMF stats show have been historically harvested in gill nets, (b) an increasing problem from blue catfish through food competition and/or direct consumption of juvenile stripers, (c) climatic changes altering spawning cycles, or zooplankton availability, or egg density, or etc...

→ Shrimp trawling in our estuaries continues to destroy millions of juvenile spot, croaker, weakfish, southern flounder, and blue crab. (a) We continue to cut the legs off of spot, croaker, and weakfish recovery by trawling through a key secondary nursery habitat, the Pamlico Sound, for the coastwide populations of these species. (b) Ignoring blue crab bycatch in this industry is certainly contributing to the troubled status of that fishery where the latest series of management measures has failed, again.

(c) Failing to protect a documented southern flounder hotspot in the latest version of the shrimp, southern flounder, and CHPP plans will only further hamper its recovery.

→ The benefits of SAV habitats are undeniable. In fact, they are one of the most critical areas throughout the coast of NC. Failing to protect them because of the recommendations of standing ACs that are dominated by the commercial industry shows only a willingness to genuflect to that industry.

→ Continuing to allow mechanical harvest of our few remaining oyster reefs: (a) removes more key habitat for numerous species, (b) promotes diminished water quality, and (c) leads to shoreline loss as oyster reefs diminish wave energy during storms.

With no synergy, no connectivity between plans, failures such as this have become the rule instead of the exception. We will not save our fisheries until we can find a way to manage the system as a whole.

Remember your basic biology. Our estuarine system is a resilient, yet fragile one full of complex habitats, food webs, and trophic levels that are all interdependent. How many important finfish species forage on crabs, mullet, menhaden, shrimp, croaker, and more? How often do flounder, stripers, trout, redfish, black drum, and sheepshead occupy the same habitat areas? What untold damage is done by excessive shrimp trawling in Pamlico Sound? How much longer can we afford to ignore the subtle complexities of our estuaries? It is a unique system that should be managed and protected as a whole.

I started attending MFC meetings in 2014. I have made public and written comments. My comments have been ignored along with most all comments that speak to resource conservation. The 1997 Fisheries Reform Act clearly states that you are responsible for saltwater resource and habitat conservation. You have failed miserably! Your own data tells the story of a saltwater resource in dramatic decline. The 1997 FRA gives you the authority to make your agenda an agenda for resource conservation not resource consumption. Your agenda drowns in five year fishery management plan updates and committee reports rather than addressing the real issues that are destroying our saltwater resource.

The real issues are the out of control use of large mesh gill nets, ocean shrimp trawlers in our sounds and rivers, restricting the use of commercial gear to true commercial fishermen and the definition of what gear should be used by recreational fishermen.

Just look to one or more states south! They have an agenda of conservation not consumption. South Carolina, Georgia, Florida, Alabama, Mississippi, Louisiana and Texas can't be all wrong and only North Carolina right!

Ron McCoy

