



December 18, 2019

Kathy Rawls
Fisheries Management Section Chief
DMF Headquarters
PO Box 769
Morehead City, NC 28557

RE: Draft Amendment 3 to the Southern Flounder Fishery Management Plan – Scoping

Dear Ms. Rawls:

On behalf of the Congressional Sportsmen's Foundation, I want to thank you for the opportunity to provide comments during the scoping process for Amendment 3 to the Southern Flounder Fishery Management Plan. As you know, southern flounder is one of the most important commercial and recreational fisheries in North Carolina. However, significant reductions in both commercial and recreational harvest are necessary to return the southern flounder population to a sustainable level.

The recent stock assessment indicated that the coast-wide southern flounder fishery has been overfished and undergoing overfishing for many years. Furthermore, the last year of data in the stock assessment (2017) indicated the southern flounder spawning stock biomass was at its lowest point in the assessment period, highlighting the urgency to end overfishing and implement a new long-term management strategy for rebuilding as soon as possible. While drastic reductions in harvest to end overfishing and allow rebuilding will be contentious and difficult, these decisions are necessary to ensure a healthy, robust southern flounder fishery for all North Carolinians.

We would like to offer the following comments relative to the scoping document and potential management strategies. We trust that the NC Division of Marine Fisheries (DMF) will develop a draft Amendment 3 that provides a robust set of options necessary to reduce fishing mortality equally across both the commercial and recreational sectors, while minimizing, to the extent possible, the impacts to fishery stakeholders.

In general

- The southern flounder fishery is in decline across the south Atlantic range. We encourage the DMF to continue to work closely with the states of South Carolina, Georgia and Florida to share equally in the necessary reductions in fishing mortality to end overfishing and begin rebuilding the population.

- Quota-based management can be an effective tool in commercial fisheries for ending overfishing and rebuilding a fish stock, provided you have accurate data in which to establish an annual quota, some index of population abundance to account for strong or weak year classes of recruits on any given year, as well as accurate fishery-dependent information to monitor the harvest. However, quota-based management often does not work well for a recreational fishery because of the difficulty in accurately determining angler harvest in pounds for in-season monitoring when relying solely on the Marine Recreational Information Program (MRIP). The inefficiencies of MRIP for in-season management are further exacerbated with relatively short seasons. The Gulf of Mexico red snapper fishery is a good example, where all 5 Gulf states now have their own supplemental angler harvest data programs. If the DMF chooses to manage southern flounder with a quota-based system for recreational anglers, we urge you to develop a supplemental recreational harvest data collection program.
- Additionally, quota-based management would require an initial allocation of the resource between the commercial and recreational sector, which is generally a highly controversial process. If allocations for quota-based management are implemented, they should be based on more than catch history alone and should include considerations for the most benefit to the state, both economically and socially.
- A potentially better alternative to quota-based management would be seasons based on a Harvest Control Rule (HCR). A combination of seasons, bag/size limits (recreational) and gear restrictions (commercial) with HCR's provide more benefits than negotiating quotas based on infrequent stock assessments. Pre-agreed management actions based on some annual indicator of stock performance can increase efficiency and transparency, while also helping to minimize contentious political negotiations.

Recreational Fishery

According to the draft Amendment 2 document, in 2017 North Carolina flounder anglers took 2.1 million trips, spent \$362 million in trip expenditures and supported 2,574 jobs. Restoring this fishery to a robust, healthy population is vitally important to the state's coastal economy. However, significant restrictions in both harvest and effort are necessary to achieve the 52% reduction in removals.

- The private recreational and charter/for-hire components should remain whole. Sector separation will be divisive and is not necessary to effectively manage the recreational fishery. Both private and charter/for-hire anglers should share the harvest reduction burden equally.
- Provide options for minimum size limits/slot limits, combined with various season lengths, relative to the necessary reductions in harvest. Reducing the minimum size limit would result in less discard mortality, while implementing a slot limit would reduce harvest of older fish.
- Evaluate weekend-only seasons vs. consecutive-day seasons as a way to maximize opportunities over time.
- To have the least amount of impact on recreational fishing opportunities, southern flounder should be managed separately from Gulf and summer flounder.

Commercial Fishery

In 2017, the North Carolina commercial southern flounder fishery landed 1.39 million pounds worth \$5.7 million in ex-vessel value and \$21.4 million in economic impact. Commercial fishing is important to the North Carolina coastal economy. However, the North Carolina commercial southern flounder fishery

accounted for the single largest source of removals of any sector in any state in 2017. No doubt the 52% reduction in removals required to rebuild the fishery will be felt the hardest by North Carolina commercial fishermen, but the reduction is necessary in order to ensure current and future generations of North Carolinians, including commercial fishermen, continue to benefit from this resource.

- North Carolina is the only state that allows commercial gill netting of southern flounder. With an average of 14,000 gill net trips per year by more than 800 participants and nets up to 2,000 yards long, the pressure on the resource is significant. Gill net gear restrictions should be included as options to reduce removals.
- Additionally, the peak of the commercial fishing season falls in the same timeframe as out-migrating females to their spawning grounds. The bottleneck of inlets and passes increases gill netting efficiency. The DMF should evaluate the use of pound nets vs. gill nets in reducing mortality during the peak migration, as well as restrictions on setting gear a minimum distance from inlets during the fall.
- Implementing trip limits across all gear types would reduce the race for fish during shorter seasons and would spread the harvest more equally across participants in the commercial sector.

In closing, the current management strategies for the southern flounder fishery have failed to maintain a sustainable population and acceptable levels of fishing-related mortality. Contention surrounding management decisions to address problems with this fishery have historically been difficult to overcome. However, in order to ensure the future of commercial and recreational southern flounder fishing in North Carolina, difficult decisions are now necessary, and all sectors must shoulder the burden equally.

Again, thank you for the opportunity to provide comments in this initial scoping phase. We look forward to working with DMF and North Carolina's fisheries stakeholders throughout this process to develop effective management solutions for restoring this important fishery.

Sincerely,



Chris Horton

Senior Director, Fisheries Policy