



July 5, 2024

Mr. Monty Crump
Chairman
North Carolina Wildlife Resources Commission
1751 Varsity Dr.
Raleigh, NC 27606

RE: 15A NCAC 10C .0307 Flounder – Temporary Amendment

Dear Chairman Crump,

On behalf of the Congressional Sportsmen's Foundation (CSF), thank you for the opportunity to comment on the temporary amendment that prevents the opening of the recreational flounder season in North Carolina in 2024. Recent southern flounder stock assessments continue to show a concerning decline in stock abundance and changes to the management strategy were needed to reduce harvest to allow the fishery to recover. Unfortunately, the North Carolina Southern Flounder Fishery Management Plan Amendment 3 likely did not go far enough, particularly from the commercial fishery perspective. It is also unfortunate that a shift in allocation to be more equitable between the recreational and commercial sectors is not scheduled to be final until 2026. Had the allocation shift to 50% for each sector occurred in 2024 as originally proposed, there likely could have been a season this year.

A fundamental challenge to successful marine fisheries management is reliable catch information on which to base both stock assessments and to monitor landings and discards for management purposes. North Carolina continues to rely on the federal Marine Recreational Information Program (MRIP) for estimates of recreational catch and effort. However, MRIP is neither timely enough to monitor landings in real time nor are the estimates reliably accurate. In August of 2023, the National Marine Fisheries Service announced that the current MRIP Fishing Effort Survey (MRIP-FES) is likely overestimating landings and discards by as much as 30-40%. Thus, it is reasonable to assume that the 2023 landings data that led to the decision to not open the North Carolina 2024 flounder season is likely lower and does not warrant such a drastic measure. Regardless, the only way to ensure sustainable management of the recreational fishery and reasonable access for anglers in the future is to transition away from relying on a federal survey that will never be able to achieve the level of timeliness or precision necessary for in season management.

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In fact, in the attached CSF letter to the Division of Marine Fisheries (DMF) concerning draft Amendment 3 in January of 2022, we warned that it would be necessary to develop a state-based recreational harvest data collection system that did not rely on MRIP to be successful. Specifically, we stated, “For recreational fisheries, quota-based management often does not work due to the difficulty in accurately determining angler harvest in pounds for in-season monitoring when relying solely on the Marine Recreational Information Program (MRIP). MRIP was designed to monitor long-term trends over time and large spatial areas and across multiple species. It was never designed for in-season monitoring of catch in pounds for a single species. The inefficiencies of MRIP for in-season management are further exacerbated with relatively short seasons. If the DMF continues down this path, the DMF should be prepared to implement a new, real-time monitoring of angler harvest to supplement and verify the MRIP estimates, which can be highly variable.” Yet, the continued reliance on MRIP two years later is largely responsible for the lack of a recreational flounder season in 2024.

Fortunately, North Carolina has a unique, well-funded opportunity to develop a mandatory reporting requirement for both recreational and commercial fisheries that, if structured correctly, could significantly enhance the sustainability of the state’s marine resources while providing additional access for North Carolina’s recreational anglers. With a new and significant burden placed on recreational anglers who do not benefit financially from enjoying their public trust resources, it is imperative that any mandatory reporting system for the recreational sector provides reliable data that can effectively supplement or replace the highly variable and unreliable angler catch information currently provided by MRIP.

The red snapper fishery in the Gulf of Mexico presents real-world examples of how state-developed angler harvest information programs can lead to better management and more angling opportunities. Faced with only a three-day red snapper season in federal waters – that was largely driven by poor angler harvest estimates using MRIP – all five Gulf States developed their own data collection programs. Today, anglers in those states enjoy months, not days, of opportunities to fish for red snapper. North Carolina’s mandatory reporting requirement could greatly benefit from learning from the Gulf States, both in their successes and their mistakes in developing independent data collection programs.

In closing, quota-based management of recreational fisheries requires reliable, real-time estimates of angler catch and effort. Even with recent “improvements” to the program, MRIP was never designed to do that. While the new mandatory reporting requirement that both North Carolina fishery management agencies are responsible for developing may seem an inconvenience to some, if designed correctly, it is the best way to ensure reliable access to healthy fisheries for North Carolinians. For this reason, we implore you to take this opportunity to develop a reliable, state-based recreational data collection program that can supplement or replace MRIP. Doing so will restore trust in the angling community and grant consistent, sustainable access to public trust fisheries resources in the future.

Sincerely,



Chris Horton
Senior Director, Fisheries Policy

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