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Sent: Thursday, May 09, 2019 9:13 AM

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Subject: [External] May meeting

Good morning all,

I wanted to send in an email to go on record for public comment. I do intend to attend the quarterly meeting next week, but as happened last time, I feel fairly certain that I will run out of my allotted three minutes of speaking time before I finish my remarks. Therefore, I am including this email to address the many issues that are of concern. I hope you will give these serious consideration and incorporate them in your needed management measures.

Many of these are species specific, so I will address them accordingly in separate paragraphs.

Certainly, the most pressing and most highly contentious problem that demands immediate action is that of the management of southern flounder. For THIRTY YEARS, both the MFC and DMF have had the data that shows that not only are southern flounder overfished, but that overfishing continues to occur. For THIRTY YEARS, both this commission and this division have refused to take substantive action that would end the overfishing and restore the fishery as is required by statute. Instead, you have chosen to refute and ignore the alarming trends in the flounder population that the science clearly shows. Rather than act, you kicked the can down the road in order to maintain the status quo. Rather than establish guidelines that would allow for a sustainable harvest extending into the foreseeable future, you delayed action so that maximum harvest could continue. Now you are faced with making severe cuts in order to save the population.

In spite of that need, the backtracking is well underway because of pressure from the commercial industry and its lobbyists. The science shows that a 72% reduction in harvest is necessary to both end overfishing in two years AND restore the SSB to healthy levels in ten years. However, as of the last AC meeting, the Division is backing away from that number and is, instead recommending a 52% reduction. That will end overfishing, but is NOT sufficient to restore the stock. Furthermore, the flounder advisory committee is backing off even further, recommending a stepped reduction of 31% this year, followed by a 52% reduction next year. That reduction comes in aggregate with 40% reductions to pound nets and gigging and a larger 75% reduction in gill netting. The AC recommendations also include reductions in gill net yardage allowed during the proposed harvest seasons. As a commission and a division, you CAN NOT allow the same practices and the same pressures to sway your management decisions.

In addition to enacting the needed 72% reductions through short harvest seasons you need to do the following:

RECREATIONAL FISHING -- (1) require circle hooks for anyone using live or cut bait, (2) reduce the creel limit to two fish in a slot limit of 14 - 20", (3) place an immediate and permanent ban on recreational gill nets
COMMERCIAL FISHING -- will have to bear the brunt of the 72% reductions since they have few current limits on harvest or allowable gear. Because 98% of the commercial harvest of flounder happens in the waters of North Carolina, they will feel the primary strain of these restrictions. (1) Continue to allow pound netting and gigging under the new harvest reductions as both are clean methods of harvest, but BAN GILL NETS. (2) Do not allow the practice of spearing to continue as a means of

removing culled fish from pound nets. (3) Make sure all gear is out of the water until the harvest season begins and is removed as soon as the seasonal limits are reached.

These suggestions will undoubtedly be impactful and tough to swallow in the short term, but are absolutely necessary if the viability of the stock is to be the priority that it should.

Next, I would ask that you be proactive and consider changes to the management of speckled trout. With the striper closure and the pending flounder reductions, the effort on trout, both recreationally and commercially will be...impressive. So, I suggest the following:

RECREATIONAL FISHING -- (1) Enact a slot on speckled trout of 14 - 22" while maintaining the four fish limit.

(2) Require circle hooks for anyone fishing with live or cut bait.

COMMERCIAL FISHING -- (1) Ban gill nets and replace them with a hook and line commercial allowance. Be clear, my suggested slot limit WILL NOT WORK WITHOUT A GILL NET BAN. (2) Reduce the daily limit to 50 fish per day.

Blue crabs are also currently overfished with overfishing occurring. Nothing could be simpler in terms of this management strategy. Reduce the allowable number of crab pots per fisherman. Make a percentage reduction in the number of pots that can be set based upon what it will take to restore a healthy population.

Management measures are also being considered on spot and croaker. Again, the needed measure is extremely simple. GET THE TRAWLERS OUT OF THE PAMLICO SOUND. The most recent data from NOAA shows that the Southeastern Trawl fleet was responsible for 80 MILLION pounds of bycatch in order to harvest 16 MILLION pounds of shrimp. Most of that bycatch was composed of spot and croaker. So here we are again, allowing the single most destructive measure of fishing in an extremely important nursery area, yet being completely unwilling to manage it properly for one reason, maintaining the profits of the shrimp industry. This is why, as a committee and as a division, you should fully support the current legislation being referred to as "Let 'em Spawn Before They are Gone."

There is other pending legislation that you should be very cautious about. Some seeks to remove the at-large seats on the MFC and replace them with scientists. That could be a GREAT thing, as long as the chosen scientists DO NOT OR HAVE NOT worked for the commercial industry or the NCFE. Other parts of it allow for management of water area leases and management of introduced species. This is just a poorly cloaked means of bringing in the fish pens from Cooke Industries, something that should be OPPOSED IN ITS ENTIRETY!!!

By the length and substance of these comments, it is obvious that there is a lot going on when it comes to managing our marine resources. It is also obvious that much of what we are doing completely misses the boat. It is time for a paradigm shift in the way we manage our estuarine systems. We have a long way to go if we are to rebuild our stocks of blue crabs, oysters, flounder, spot, croaker, gray trout, striped bass, redfish, and more to healthy levels. We can no longer afford to ignore clear trends in scientific data to maintain the status quo. We can no longer afford to allow antiquated and destructive gear in our primary and secondary nurseries. We do need to address issues of water quality and habitat loss, but do so CONCURRENTLY with sound management practices, not in lieu of them.

Sincerely,
Stuart Creighton