May 13, 2015

Southern Flounder FMP Supplement Options

The Coastal Conservation Association of North Carolina believes the current state of our southern flounder fishery reflects a lack of vision and leadership from our state’s fisheries managers over the last thirty years. Now North Carolina’s most valuable commercial and recreational finfish, southern flounder, is a shadow of its former abundance. Decades of non-action have ultimately resulted in a majority allocation of harvest and de facto prioritization to the destructive large mesh gill net fishery.

To use today’s fishery as a template for future management does nothing but preserve the trends and factors that led us to the situation where we are now: a collapsed fishery that demands the majority of the Division’s time and resources while falling far short of its real potential.

CCANC believes this supplement process creates an opportunity to create a new strategy where the resource is conserved and its economic potential realized. If the MFC chooses to remain with status quo they are locking in the source of all of our problems, an over-capitalized large mesh gill net fishery, at the expense of all other user groups: pound nets, gigs, recreational fishermen, the For-Hire industry and the public. Instead of focusing on “being equitable among users” we must concentrate on the source of the fisheries main problems and ask, what is best for the fishery and our coastal economy? That must start with placing the majority of the reductions on the large mesh gill net fishery.

CCANC asks that no further reductions be placed upon the recreational fishery. All past cuts have been placed upon the backs of recreational anglers and have virtually eliminated the viability of NC’s most popular recreational fishery. As documented in the supplement paper, reductions in recreational catch will result in minimal reductions in harvest, yet come at massive economic and social costs to recreational fishermen and the recreational fishing industry.

While the stock assessment cannot determine what cuts should be, it is very clear that the stock is in dire shape and reductions must be made. As cuts will likely either be “fished around” by commercial gears or be less than modeled due to undocumented catches – CCANC believes that harvest of southern flounder must be cut by at least 40%.

Dedicated to the Conservation of North Carolina’s Marine Resources

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CCANC requests that NCMFC approve the following management options to be sent out for public comment:

**Preferred Options**

1. No reductions to the recreational bag limit and no changes to the recreational size limit.

2. Moratorium on the large mesh gill net fishery.
   
   2.1. In conjunction with a large mesh moratorium, have a spawning season closure that differs for north of Hatteras (Oct 1) and south of Hatteras (Nov 1) so pound net allocation will be more equitable.

3. Adjust the commercial size limit to 15”
   
   3.1. Require 6” escape panels on pound nets.
   
   3.2. If large mesh gill nets are to be retained, CCANC requests that we require a minimum mesh size of 6” transitioning to 6.25” by 2016 to reduce what is already an inappropriate number of discard.

4. Immediate moratorium on all new pound net applications.

5. If large-mesh gill nets are to be retained, CCANC requests an immediate moratorium on all new gill net permits to prevent continued over-capitalization of that gear.

6. Management of southern flounder under a TAC
   
   6.1. While NCDMF leadership has raised concerns regarding the viability of managing with a TAC in the short term, CCANC believes if the NCDMF can manage our commercial red drum and striped bass fisheries with a TAC (CAP) then the same management option can be considered for Southern flounder.
   
   6.2. Currently recreational harvest is 21.4% and commercial harvest is 78.6%. We request that a TAC allocate a 50/50 split between the recreational and commercial sectors.

7. Seasonal Closures
   
   7.1. If the MFC is unwilling to place a moratorium on large mesh gill nets or manage under a TAC, we request that, in conjunction with raising the commercial size limit to 15,” that the state-wide commercial season be closed by October 15th.