



## North Carolina Chapter of the American Fisheries Society

31 January 2019

Rules Coordinator  
NC Wildlife Resources Commission  
1701 Mail Service Center  
Raleigh, NC 27699-1701

Dear NCWRC Rules Coordinator:

The North Carolina Chapter of the American Fisheries Society (NCAFS) is writing to provide comments on the proposed 2019-2020 fishing, hunting, trapping, and wildlife resource management regulations. Our organization represents more than 170 fisheries professionals in North Carolina, with members from academia, non-governmental organizations, private industry, and natural resources management agencies. Here, we highlight the proposed regulations that we consider important for maintaining and improving North Carolina's fisheries and aquatic resources, and address areas of concern.

First, we express support of Proposed Rule F20 (Equipment – Pee Dee River Archery Equipment), which limits the use of archery equipment to catfish only. We support this rule because it will likely reduce the accidental take of native sportfishes. In addition, it will reduce the possibility of inadvertently taking the State Endangered Robust Redhorse and currently-undescribed Carolina Redhorse, which bowfishers might confuse with similar species that are routinely harvested (i.e., Smallmouth Buffalo, Common Carp). The Robust Redhorse has been petitioned for federal listing and the NCWRC values its continued protection based on the recent draft "Conservation Plan for the Robust Redhorse (*Moxostoma robustum*) in North Carolina." In addition to establishing conservation goals for the Robust Redhorse, the draft conservation plan specifically highlights the threat from introduced catfish species.

The NCAFS expresses concern about Proposed Rule F16 (Catfish Pee Dee River Creel Limit). It is unorthodox to protect introduced fishes (i.e., Flathead and Blue Catfish) that threaten native sportfish (Striped Bass, Sunfishes, Shad species and Bullhead species) for which there are well-established fisheries with tremendous public support. These native sport fisheries generate income for the counties and municipalities adjacent to the Pee Dee River. Further, this rule would likely undermine recovery efforts of the Robust Redhorse, ongoing since 1995 by more than a dozen state, federal, and private industry partners of the Robust Redhorse Conservation Committee, including the NCWRC.

**Proposed Rule F20 would support the goals of the draft Robust Redhorse conservation plan and we support the adoption of that rule.** However, Proposed Rule F16 appears to conflict with the stated purpose of Proposed Rule F20 and the goals outlined the Robust Redhorse conservation plan. Based on this disparity and the effects of nonnative catfishes on several other popular sport fisheries, **the NCAFS suggests that the NCWRC reject Proposed Rule F16 and retain the general statewide regulation for catfishes.**

Please contact the NCAFS if you have questions regarding these comments (Environmental Concerns Committee Chair: [jennifer.m.archambault@gmail.com](mailto:jennifer.m.archambault@gmail.com)).

Respectfully,

Tyler Black, NCAFS President