

Coastal Conservation Association Comments on Addendum II to Amendment 6 to the Atlantic States Marine Fisheries Commission Striped Bass Fishery Management Plan

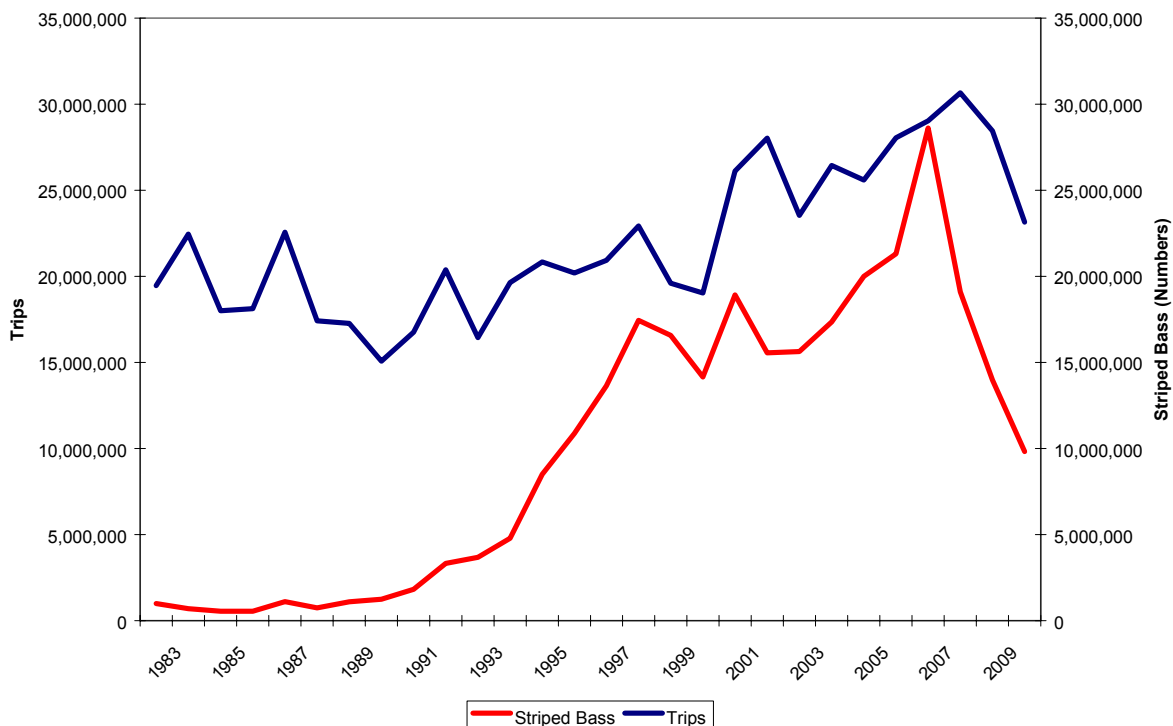
Coastal Conservation Association was created 33 years ago and today has about 100,000 members in 17 state chapters along the Gulf, Atlantic and Pacific coasts. CCA has been active in virtually every national marine fisheries debate since 1984 and operates as a three-tiered organization, affecting issues on the local, state and national levels. We would like to thank you for the opportunity to comment on this proposed action affecting Atlantic striped bass management.

CCA is opposed to increasing the coastal commercial harvest of striped bass, thus we support Issue 1, Option 1 – Status Quo. Below is our rationale:

First reason – We believe the coastal striped bass population is currently decreasing and additional harvest is not warranted at this time. The Atlantic Striped Bass Technical Committee (TC) noted, at its meeting on March 24 that the abundance of age 8+ fish will decline at least through 2015. Many members tell us they are not encountering striped bass in the same numbers as they did previously. The facts bear this observation out – the catch and harvest of striped bass (as measured by the Marine Recreational Information Program, the current recreational data collection program) has declined precipitously in recent years. Anglers caught 65 percent fewer striped bass in 2009 than they did in 2006.

We believe that recreational catch, when viewed on a coastwide basis, serves as a proxy for striped bass abundance. Since such catch has now declined to mid-1990 levels, we believe there is cause for significant concern.

Striped Bass Catch (A+B1+B2) Vs. Trips



The number of trips taken by shore and private boat fishermen in state waters has declined, but far less than has the catch of striped bass. This further supports our belief that the cause of the decline in recreational striped bass catch is driven by a decline in the underlying stock and not declining effort. We believe the ASMFC should be more precautionary with striped bass management in light of the observed decline in abundance, not less.

Second reason – *Mycobacteria* has been found in more than 60% of the striped bass sampled in the Chesapeake Bay and we believe the disease represents a serious threat to the recruitment of striped bass from the Bay to the coastal population. The majority of fish that populate the northern and southern end of the range come from the Chesapeake Bay. These are the areas that are experiencing declines in recreational encounters. Until the effect of the current *Mycobacterium* infection on the Chesapeake Bay stock of striped bass is determined, we believe the ASMFC should proceed cautiously with management measures.

Third reason – An economic analysis conducted by the Virginia Institute of Marine Science in 2000 compared the value of the recreational striped bass fishery in Virginia to the value of the commercial striped bass fishery. Their conclusion was that the greatest benefit to the state would be to allocate 100 percent of the striped bass harvest to the recreational fishery. The commercial fishery would have to sell their catch for more than \$20 per pound to equal the value of the recreational fishery. While this particular analysis is for Virginia, we believe it is the best available economic data and broadly applicable to the entire fishery until further economic analyses are conducted in other areas.

Addendum II is lowering the economic value of the fishery by shifting allocation to the commercial fishery and away from the recreational sector.

The proposed increase of the coastal commercial harvest is in fact an allocation shift by the ASMFC. Since the coastal population is managed by an overall F target, which includes commercial harvest and discards, any increase in commercial mortality means less mortality available to the recreational fishery. In times of abundance, this effect is small, but in a declining stock the allocation shift would be more evident.

Furthermore, there are essential differences between the recreational and commercial fisheries. The commercial fishery is reliant on managing for maximum sustainable yield, and thus harvest. MSY management by definition means reducing a stock to less than half its virgin biomass to maximize yield per recruit. The recreational fishery is reliant upon abundance and a representative age structure to maximize the encounter rate. The recreational fishery is not so dependent on harvest, with the number of fish caught and released usually far outnumbering those killed. We believe striped bass, one of the more sought after and prized species on the Atlantic coast, would be better served by decreasing overall fishing mortality to restore abundance and further improve the age structure of the population.

In closing, we believe this is a time of uncertainty, when juvenile abundance indices are indicating lower levels of spawning success and both disease and illegal harvest pose yet unquantified threats to the population. Under such circumstances, the ASMFC Striped Bass Management Board should be taking a precautionary approach to management, perhaps considering alternatives for decreasing mortality by all sectors, and certainly not increasing harvest. Striped bass are the ASMFC's crown jewel for management success. We believe Addendum II is potentially a serious threat to that success and should not be adopted.