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**CONSERVATION & PROTECTION OF MARINE LIFE**

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November 7, 2018

Kelly Denit  
Division Chief, Office of Sustainable Fisheries  
NOAA Fisheries  
1315 East-West Highway, SSMC3  
Silver Spring, MD 20910

RE: Proposal to Open the Block Island Transit Zone to Striped Bass Fishing

Dear Ms. Denit,

Thank you for the opportunity to comment on the current proposal to open the Block Island Transit Zone to recreational fishing for striped bass. The Coastal Conservations Association (CCA) is opposed to this proposal.

Striped bass are the most sought-after nearshore species on the Mid-Atlantic and New England coasts. Striped bass spawn, grow old and die migrating annually up and down the most populated coastal area in the country, exposing them to intense angling pressure virtually year-round. The continued closure of the Exclusive Economic Zone (EEZ) to the possession of striped bass has provided an important refuge from harvest for the most valuable portions of the striped bass stock at key portions of the year. The largest and oldest females often spend the winter in the EEZ where they can escape persecution by both recreational and commercial fishermen as they prepare for spring spawning runs.

We believe opening even a small portion of the EEZ is sufficiently risk-prone and could jeopardize the conservation value of the EEZ closure. By itself, the small opening proposed may have little effect on the population, but we believe many other coastal states may then apply to have areas off their coast open to striped bass fishing, both commercially and recreationally, thus denigrating the current conservation value of the closure.

Furthermore, we believe it is premature to take action on this proposal at this time as a benchmark stock assessment is currently underway and will be completed by February 2019. Preliminary results from that assessment indicate there may be serious problems with the stock. At the very least, NOAA Fisheries should withhold consideration of the proposal until the results of the stock assessment are peer reviewed and fully understood.

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We support the continued closure of the Block Island Transit Zone to recreational striped bass fishing. The conservation value of the EEZ closure is critical to maintaining adequate spawning stock biomass, and could be compromised if the EEZ were opened in additional areas.

Thank you for the opportunity to comment on the proposal to open the Block Island transit zone to striped bass fishing.

Regards,

A handwritten signature in cursive script that reads "Bill Bird".

Bill Bird, Chairman  
CCA National Government Relations Committee