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6919 Portwest Drive, Suite 100 | Houston, Texas 77024

p 713.626.4234 | f 713.626.5852 | www.JoinCCA.org

October 3, 2019

Max Appelman  
 Fishery Management Plan Coordinator  
 1050 N. Highland St.  
 Suite A-N  
 Arlington, VA 22201

Dear Mr. Appelman,

Thank you for the opportunity to comment on Addendum 6 to the Atlantic States Marine Fisheries Commission's Striped Bass Fishery Management Plan. The Coastal Conservation Association is the largest marine resource conservation organization of its kind in the nation, with more than 130,000 members in state chapters on all three coasts.

Striped bass are an iconic species for legions of saltwater recreational fishermen on the Atlantic coast and are pursued from the time they reach 18 inches in the estuaries of their natal rivers. The fishery on them is conducted 12 months of the year as they migrate along the most heavily populated coastline in the country, with the waters of the Exclusive Economic Zone acting as a refuge for the breeding population. It is a remarkable achievement that the ASMFC's management of this fishery has maintained the population as well as it has since the recovery in 1995.

Under proper conservation measures for both size and bag limits, fishing for the decade after the recovery was exceptional, seemingly everywhere from Maine in the summer to North Carolina in the winter. This period was also marked by a period of above-average recruitment. Predictably, however, recruitment went through a below-average period and the population started to decline. In hindsight, the ASMFC should have acted to reduce the fishing mortality during the low recruitment period to slow that decline. The Striped Bass Technical Committee advised the Board that spawning stock biomass (SSB) was declining and that unless recruitment changed, the stock would become overfished. The SSB declined below

the target level in 2012 and finally declined below the threshold in the 2018 stock assessment report.

The ASMFC should be applauded for acting to end overfishing as soon as they received this stock status last year. However, given the importance of striped bass to the Atlantic recreational fishery, and the inherent critical importance of abundance to the recreational fishery, the ASMFC should have heeded their Technical Committee's advice and stopped the steady slide of SSB. As we have argued since the inception of Amendment 6, fishing mortality was too high for the stock to remain abundant and indeed the population has declined to the great concern of the angling community. A reduction in fishing mortality, greater than the currently proposed 18 percent, would pay dividends for the future abundance of striped bass and help guard against the inevitable downward variations in recruitment success in the future.

With regard to the options that are available in Addendum 6, CCA supports Option 2 – equal percent reductions for all sectors – as all sectors should take equal reductions as a matter of fairness.

Additionally, CCA supports the mandatory use of circle hooks when using natural bait as a matter of principle. We encourage all states to develop monitoring programs so that the conservation gains realized by the use of circle hooks translate into lower discard mortality and greater abundance.

Sincerely,

A handwritten signature in cursive script that reads "Bill Bird". The signature is written in black ink and is positioned below the word "Sincerely,".

Bill Bird, Chairman  
CCA National Government Relations Committee