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January 10, 2020

Dr. Michael Schmidtke, FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street
Suite 200A-N
Arlington, VA 22201

Dear Dr. Michael Schmidtke,

Thank you for the opportunity to comment on Draft Addenda III to the Omnibus Amendment to the Interstate Fishery Management Plans for Spanish Mackerel, Spot and Spotted Seatrout and Draft Addenda III to Amendment 1 of the Interstate Fishery Management Plan for Croaker, which are of great concern to our members. 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.

We have long been concerned about the status of croaker and spot, and have been dismayed by the lack of management action to restore anything resembling historic abundance.

Spot and croaker have long been the backbone of the inshore and nearshore fishery in the southeast. Ocean fishing piers depended on the fall run of spot to make a profitable year; hordes of "spot jocks" descended on their favorite ocean piers to catch spot, which was a major boon to coastal economies. The croaker fishery was a cosmopolitan fishery that was available to anyone who could wet a line in the estuaries.

Those fisheries are essentially gone.

In North Carolina, the commercial landings of spot, croaker and weakfish have declined nearly 90 percent since 1997. The recreational harvest of spot in the South Atlantic area has fallen from 18 million fish in 2001 to 4 million fish in 2018; croaker have been under their long-term mean in the South Atlantic for much of the last 20 years.

These three species have one attribute in common - they are the dominant species caught as bycatch in the southeast shrimp trawl fishery. North Carolina allows shrimping in most inshore waters and is the last state on the Atlantic coast to allow significant shrimping effort in estuarine waters. Over the past four years, North Carolina shrimpers have landed

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9 million pounds in 2015, 13 million pounds in 2016, nearly 14 million pounds in 2017 and nearly 10 million pounds of shrimp in 2018. **That means that on average they caught 11.5 million pounds of shrimp – and discarded dead about 45 million pounds of bycatch. The majority comprised of spot, croaker, menhaden and weakfish.** In fact, reducing directed harvest of spot and croaker without addressing shrimp trawl discards would accomplish little.

We are concerned that the traffic light approach (TLA) may not work to restore abundance of spot and croaker; it certainly has not worked thus far. We believe a simpler approach is better – reduce catch now, by at least 25 percent in both the commercial and recreational fisheries as well as, most importantly, shrimp trawl bycatch, in order to begin restoring abundance of these keystone species. We realize 25 percent may not be enough, but we strongly believe that reducing removals now will pay dividends in the near future and will take the pressure off so that the TLA can be better refined. Deeper targeted cuts in removals may be necessary.

Many a youngster's first trip to the coast used to be to catch a mess of spots or a bucketful of croaker. Those fisheries used to be an economic boon for coastal communities. They provided a dependable, accessible resource for the public to enjoy and we have allowed them to all but disappear. That much of this decline is attributable to those species being discarded and wasted as bycatch from shrimp trawls in sensitive estuaries is simply tragic.

It is past time the ASMFC acted to restore these important fisheries to their past abundance.

Sincerely,

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

Bill Bird, Chairman
CCA National Government Relations Committee

cc:

Patrick C. Keliher, ASMFC Chairman
ME Dept. of Marine Resources
21 State House Station
Augusta, ME 04333-0021