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From: Tim Hergenrader

Sent: Monday, February 11, 2019 11:23 AM

To: Fish, Nancy <nancy.fish@ncdenr.gov>

Subject: [External] Feb. Commission Mtg.

Please forward this to the Commissioners. Thank you.

Feb. Commission Mtg.

The following are my comments for your consideration re. CSMA striped bass.

Despite the CSMA strippers being a major fisheries management issue for years, the only major change that has happened in my recollection regarding strippers has been changing the regulations permitting the commercial fishing industry to sell net caught strippers based upon a quota.

Prior to this, it was illegal to sell CSMA strippers. This change was implemented because strippers were being killed in commercial nets and the fishermen were discarding the dead fish. Unintended consequences of untended set nets! By catch!

I attended the recent stripper meeting in Washington that was well attended. Not ONE person attending that meeting who spoke supported the DMF position that a moratorium on strippers would help alleviate the declining stripper population in the CSMA. A population only kept at current levels by a stocking program facilitated by the federal government and the NCWRC.

There were those, including me, who opposed the moratorium unless ALL nets are removed in the Neuse and Tar/Pamlico rivers from the respective ferry crossings upstream to the inland water boundaries. Additionally, all nets in the remaining CSMA waters must be attended at all times.

I base my positions on the following taken from a WRC study:

"Linear modeling indicates gill net effort is the most important factor influencing spawning stock mortality among the exploitation and environmental factors examined. Gill net effort accounted for substantially greater variability in spawning stock mortality than commercial harvest, and the model-averaged coefficient identifies gill net effort discrete annual fishing mortality $u = 0.29$. This suggests that the commercial multispecies gill net fishery imparts substantial mortality even when the Striped Bass harvest season is closed. The reason for this mortality is obscure, but may be attributable to dead discard mortality; over-quota and high-grading mortality; avoidance, predation, and drop-out mortality; or unreported, miss-reported and illegal harvest (ICES 1995; Gilman et al. 2013; Uhlmann and Broadhurst 2015; Batsleer et al. 2015). In particular, discard mortality should be carefully considered as Clark and Kahn (2009) found that Striped Bass are acutely susceptible to discard mortality in multispecies gill net fisheries. Furthermore, Striped Bass discards in the large mesh gill net fishery were identified as the primary source of mortality within the CSMA (NCDENR 2013). The effect of gill net effort on discrete annual mortality as estimated by linear modeling is within 3% of the estimated effect of cryptic mortality in a cohort-based model ($u = 0.26$; Table B.3 in Rachels and Ricks 2015), while the effect of commercial harvest was identical to the estimated commercial harvest discrete annual fishing mortality rate in that study.

Our research suggests fisheries managers should reduce exploitation by focusing on reductions in gill net effort in areas of the Neuse River utilized by Striped Bass. Reducing spawning stock exploitation may confer an increased likelihood of recruitment during periods of favorable environmental conditions, thereby leading to improvements in population abundance and increased numbers of wild fish in the spawning stock."

I assume you have the results of a DMF "study" that apparently disputes the cause of cryptic mortality in the stripers. Using turtle observers to obtain "scientific data" on stripers is an insult. We all know the problems associated with observers. Furthermore, sea turtles aren't found in the upper reaches of the rivers, where the majority of the stripers are found. Consequently, the observers weren't even observing in the areas that contain the majority of the stripers! Look at their data points and you will see they were down river where there are turtles.

This is nothing more than a grasping for data by an agency hell bent on keeping the nets in the water at all costs. This DMF should not even be part of the discussion since they provide little to the management. I was told years ago, they only maintained the tag return program. That can be done by a clerk with a computer!

If you enact only a moratorium, you will take us BACK. Back to the times when the commercial netters were netting stripers and either discarding them dead as by catch or selling them off the books. You will do nothing for the resource! Nothing, nada!