



December 30, 2020

Mr. David Borden, Chairman
ASMFC Striped Bass Board
1050 N. Highland Street, Suite 200 A-N
Arlington, Virginia 22201

RE: Reconsideration of the Use of J Hooks with Tube Lures/Jigs when Trolling for Striped Bass

Dear Mr. Borden:

On behalf of recreational striped bass anglers, the for hire fleet and associations that represent them, detailed in this correspondence from Maine to New Jersey, we respectfully ask you to reconsider the recent decision to eliminate all exemptions from the Addendum VI requirement for anglers using in-line circle hooks with natural bait when targeting striped bass. Specifically, we seek to maintain an exemption from this requirement for the trolling of a tube-and-worm rig and jig with a J hook for catching striped bass that has a negligible chance of deep-hooking fish. A tube and worm exemption was proposed by the states of Massachusetts and Maine, which have both been proactive in requiring the use of circle hooks with natural bait prior to the requirements of Addendum VI.

We are fully supportive of the intent of Addendum VI's circle hook provision, which is to reduce the post-release mortality of striped bass in the recreational fishery. We understand the concern of some Striped Bass Board members that providing any exemptions to the circle hook requirement could provide loopholes in certain circumstance that could be exploited by anglers. That being said, we believe that a narrowly-constructed, clearly articulated exemption for the trolling of a tube-and-worm and jig is in the spirit of Addendum VI (reducing discard mortality) while allowing anglers to continue employing a traditional and effective technique.

The tube-and-worm rig consists of a long latex or rubber tube with a single J-hook protruding from the end, which is baited with a large seaworm/sand worm (*Nereis virens*). The rig is trolled slowly behind a moving vessel with the reel engaged (i.e., not in free-spool). Because the boat is moving, the reel is engaged, and the latex/rubber of the tube extends to or beyond the hook gap, the tube-and-worm rig rarely results in the gut-hooking of striped bass.¹ One can conclude the

¹ Daniel McKiernan, Director, MA DMF. MA Implementation Plan for Striped Bass Addendum VI Circle Hook Requirement. Memorandum to Max Appelman, ASMFC Striped Bass Plan Coordinator, dated August 14, 2020.

same utilizing the similar trolling method with jig and associated J hook that generally does not result in the gut-hooking of striped bass.

The use of a J hook when trolling with artificial lures (tube and worm/eel skin, jigs with pork rinds, etc.) with live or dead bait is a reliable method to reduce post release mortality, in most cases the striped bass is hooked in the jaw and not deep in the throat or gut. Furthermore, a circle hook used with trolled a tube or jig will not effectively catch fish because circle hooks are not designed for this. The use of these methods with a J hook is effective, straightforward, and reduces post release mortality.

It should be noted the NMFS HMS FMP requires, when fishing for shortfin mako, the use of circle hooks with an exemption for artificial lures or flies. We recommend you refer to this measure as well as the State of Maine requirements noted below for use of tube and worm with a J hook as a baseline or criteria to utilize when fishing for striped bass.

Our recreational fishery suffers from a reduction in younger anglers entering the fishery. These simple, straight-forward trolling methods often result in the first fish caught by young anglers, and to limit such will negatively impact the entrance of young anglers into the fishery. In addition, conservation measures that do not make sense to fisherman or do not effectively reduce post release mortality could diminish buy-in for new regulations and reduce compliance with the circle hook mandate. Ultimately, many recreational fishers want to do the right thing to help striped bass, but we feel these measures will cause more harm than good.

The ban on use of worms while striped bass fishing will have a negative economic impact on coastal tackle shops and worm diggers from Maine. Many for hire-boats spend \$2,000 per year annually on worms (tube and worm) purchased from their local tackle shops. Mr. Peter Santini of Fishing Finatics, a tackle shop in Everett, MA, purchases more wholesale Maine seaworms than any other shop in the Boston area. He told us that 75% of the worms he sells annually is for tube and worm rigs, along with thousands of dollars' worth of tubes. That's a big part of his market, which is now closed off to him, and that reduction, multiplied by all the coastal tackle shops in the Northeast, will certainly negatively impact the Maine worm diggers as well. In addition, when anglers enter a tackle shop to purchase worms, they often buy other tackle items as well. To remove such will result in decreased sales and/or revenue. The impact to tackle manufacturers, tackle shops and the hard working worm diggers from Maine will be significant, especially during these tough economic times as a result of COVID.

To allow for the use of the techniques noted above, we propose a very specific coast-wide exemption that allows the use of the tube-and-worm rig with a J-hook when trolling and using natural bait. If a coast-wide exemption is not feasible, we would ask that individual states be allowed to include such an exemption in their regulations. We support the wording that Maine's Department of Marine Resources has used for tube and worm, below:

- It is unlawful to use any hook other than a non-offset circle hook when using bait.
- **Exception:**

- Rubber or latex tube lures may be used without a circle hook as long as they are a minimum of 8 inches long and have a single hook protruding from the end portion of the tubing where bait may be attached.²

We further request that jigs (lead-head style, dressed with natural or synthetic hair) also be exempted from the circle hook requirement, as long as the jig has a single fixed hook protruding from the end portion where bait may be attached. Exempting pork rind attached to a trolled lure should also be considered.

As the Striped Bass Management Board prepares to release a Public Information Document as part of the Amendment 7 process, stakeholder engagement will be critical. Implementation of an exemption to the Addendum VI circle hook requirement for the tube-and-worm rig and jig with a J hook will demonstrate to the recreational community the Board's willingness to listen to and work with anglers to promote striped bass conservation while avoiding undue burdens. Such a demonstration of good faith will only serve to benefit both fishermen and the resource as we collectively work to improve striped bass management and rebuild the stock. Based on the lines of evidence detailed above, we hope you will reconsider and retract the ban on use of J hooks with live or dead bait while trolling via tube and worm or a jig when fishing for striped bass.

Thank you for your consideration of this important matter.

Very truly yours,

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² Maine Department of Marine Resources. 2020 Maine Striped Bass Regulations.
https://www.maine.gov/dmr/recreational-fishing/regs-tips/documents/2020_stripped_bass_regs.pdf.

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