



Connecticut Department of

**ENERGY &
ENVIRONMENTAL
PROTECTION**

Robert J. Klee, Commissioner

January 29, 2016

The Honorable Joe Courtney
Representative
U.S. House of Representatives
2348 Rayburn House Office Building
Washington, DC 20515

Dear Representative Courtney:

Thank you for inquiring of the Connecticut Department of Energy and Environmental Protection (DEEP) about the effects to the state should HR. 3070, the EEZ Clarification Act, be enacted into law. DEEP's concerns are such that I write to express strong opposition to the bill.

Connecticut's objections to this bill extend well beyond striped bass management which seems to be at the core of this bill. Connecticut commercial fishermen operate in what are now federal waters (EEZ) under federal fishery permits. If these federal waters become state waters divided between the states of New York (NY) and Rhode Island (RI), access to these waters will be lost to these Connecticut Commercial fisherman. This is already the case for lobstermen fishing in any waters that fall under RI jurisdiction as that state prohibits non-residents from fishing for lobsters in their waters. Connecticut commercial fishermen who do not hold non-resident fishing licenses in NY or RI for other fisheries will also be permanently excluded from fishing in this area. In addition, commercial fishing for state quota-managed species such as summer flounder, scup and black sea bass would be greatly complicated by the fact that each state sets different daily harvest limits to manage their state quotas. Presently, Connecticut vessels fish these federal waters only under Connecticut's harvest limits (there are no federal possession limits). If these federal waters become NY and RI state waters, our fishermen would be held to the most restrictive of the states' regulations, which is unfair and counterproductive to our agency-industry cooperative approach to the management of these quotas.

Striped bass conservation will also suffer since fishing for or harvesting striped bass in federal waters is prohibited. Likewise, Connecticut statutes prohibit commercial fishing for striped bass. The Atlantic States Marine Fisheries Commission just last year had to cut daily recreational harvest limits in half due to concerns over the declining striped bass stock size. The waters around Block Island seem to be holding an unusually large proportion of the adult striped bass population in recent years. Converting these federal waters to state jurisdiction will expose these reproductive-age fish to significant mortality rates. The vast majority of anglers have opposed these changes at our public hearings on striped bass management. That is, they would see this not as an opportunity, but as a threat to the long term health of the species.

Transfer of these federal waters to NY and RI authority would also complicate recreational fisheries management for some species. While our three states have uniform management practices for some species, we have not reached such agreements for other species due to the differing desires of anglers in each state. Connecticut DEEP Marine Fisheries holds public meetings and otherwise solicits public input when making required annual adjustments to recreational harvest limits, minimum size and open seasons for several species. Having productive, nearby federal waters fall under NY and RI jurisdiction simply complicates our efforts to provide the kind of opportunity anglers ask for, such as time of open seasons, possession limits, and the like. Management of these waters would reflect the interests of RI and NY, but not necessarily CT anglers.

For these reasons, I ask that you work with the other members of the Connecticut congressional delegation in opposition of this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Klee", with a stylized flourish at the end.

Robert J. Klee
Commissioner