Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: **Atlantic Striped Bass Management Board**

FROM: **Emilie Franke, FMP Coordinator**

DATE: **April 19, 2021**

SUBJECT: **Public Comment Summary on Draft Amendment 7 Public Information Document**

The following is an overview of all comment received by ASMFC on Atlantic Striped Bass Draft Amendment 7 Public Information Document (PID) as of April 9, 2021 (closing deadline).

A total of 3,063 comments were received on the PID from individuals, organizations, and form letters. A total of 50 organizations submitted comments on the PID. A total of 2,397 comments were received through 14 form letters, some of which were multiple variations of two different organizations' comments. The remainder of comments (616) came from individual stakeholders including recreational fishermen, commercial fishermen, and concerned citizens.

Eleven public hearings were held via webinar for 11 jurisdictions. 491 individuals (not including state staff, ASMFC staff, or Commissioners/Proxies) attended the hearings and some of these individuals attended multiple hearings. Not all participants provided comments and the comment summary only reflects the comments provided during the hearing.

The following pages are intended to give the Board an overview of comments provided on each issue presented in the PID. Due to the broad scope of the PID, public comments covered a wide range of topics with some comments responding directly to each issue in the PID, some comments responding to a subset of issues in the PID, and some comments addressing topics that were not addressed in the PID, which were categorized under *Issue 10: Other Issues*. The following overview provides a summary table for each issue specifying the most common comments received as well as additional relevant comments. Due to breadth of comments received, this overview does not represent the entirety of topics addressed by the public comments. Some comment columns in the summary tables are mutually exclusive, for example maintaining the current biological reference points or changing them, while other comment columns are not mutually exclusive, for example supporting additional angler education and supporting additional gear restrictions to address recreational release mortality.

The summary tables are followed by the letters and emails sent by organizations, form letters with total petitioner count, and letters and emails sent by individuals. Hearing summaries and attendee lists are provided as a separate attachment included in the 2021 Spring Board meeting materials.

Public Comment Summary Tables

Table 1. All public comment received by individuals, organizations, and form letters, and number of people who provided comments during the public hearings by state.

Written Public Comment Received		
Form Letters		2,397^
Individual Comments		616
Organizations		50
TOTAL		*3,063*
Public Hearing	**# Public Attendees***	**# Commenters****
Maine	65	20
New Hampshire	39	10
Massachusetts	140	37
Rhode Island	62	16
Connecticut	54	22
New York	77	20
New Jersey	67	19
Delaware	14	2
Maryland	82	14
PRFC	47	11
Virginia	29	6
TOTAL	*676**	*177***

^14 different form letters received, some of which were multiple variations of two different organizations' comments.

**Some people attended multiple hearings. 491 unique public attendees attended the public hearings. Public attendees do not include state staff, ASMFC staff, or Commissioners/Proxies.*

***Some individuals and organizations provided comments at multiple hearings.*

Table 2. Comment summary for Issue 1: Fishery Goals and Objectives.

Issue 1: Fishery Goals and Objectives					
	Maintain Goal/Obj	**Change or Add Goal/Obj**	**Manage for Abundance***	**Support Regulatory Consistency**	**Stability and/or flexibility should not override goal**
Individual	119	11	119	37	24
Form Letter	1530	4	163		1259
Organization	27	7	13	6	9
Written Total	**1676**	**22**	**295**	**43**	**1292**
Hearings					
ME	12	1	6		1
NH	3		5		
MA	2		9	3	
RI	5	2	4	1	
CT	9	1	10		
NY	6	1	8		7
NJ	1		5		
DE	1				
MD		1			
PRFC	1				1
VA	3				6
Hearing Total	**43**	**6**	**47**	**4**	**15**

**Refers to managing for abundance vs. managing for harvest or yield. Counted comments stated "manage for abundance", "put the interest of the species before the fishery", or similar.*

Overview of Issue 1: A majority of comments favor maintaining the goals and objectives established in Amendment 6. Many comments noted the goals and objectives are sound but the problem is the Board has not adhered to the goal and objectives. Many comments specifically stated this issue should be removed from consideration for Draft Amendment 7.

A notable amount of comments stated striped bass should be managed for abundance rather than managing for harvest or yield. Regarding the management themes identified by the Board, some commenters noted general support of regulatory consistency and many commenters addressed this specifically in their comments on reference to regional management and conservation equivalency (Issues 5 &6). A few commenters noted general support of flexibility. Some individuals and form letters noted that the management themes, especially flexibility and management stability, should not override the stated goals and objectives of the FMP.

Regarding the timing of Amendment 7, some commenters noted concern about developing a new amendment before a rebuilding plan is put in place to address the overfished stock and before there is information available on the effectiveness of Addendum VI measures put in place to reduce fishing mortality.

Table 3. Comment summary for Issue 2: Biological Reference Points (BRPs).

Issue 2: BRPs		
	Maintain 1995 BRPs	**Change BRPs**
Individual	237	6
Form Letter	2389	
Organization	42	4
Written Total	**2668**	**10**
Hearings		
ME	17	
NH	5	
MA	5	1
RI	8	2
CT	13	
NY	11	
NJ	8	1
DE	1	1
MD	5	
PRFC	2	3
VA	3	
Hearing Total	**78**	**8**

Overview of Issue 2: This issue received the most comments overall compared to the other issues. An overwhelming majority support maintaining 1995 as an appropriate reference year and basis for the BRPs. Many comments noted concern that changes to the BRPs were being considered and commenters noted that not achieving the target thus far is not a reason to change the BRPs. Many comments specifically stated this issue should be removed from consideration for Draft Amendment 7.

Table 4. Comment summary for Issues 3-4: Management Triggers and Stock Rebuilding Timeline & Schedule.

Issues 3-4: Management Triggers & Rebuilding Timeline					
	Maintain All Current Triggers	**Modify Recruitment Trigger, Maintain SSB/F Triggers**	**Modify SSB and/or F Triggers**	**Maintain 10-yr Rebuilding**	**Faster Rebuilding**
Individual	54	78	4	170	29
Form Letter	146	96		289	
Organization	9	11	9	28	3
Written Total	**209**	**185**	**13**	**487**	**32**
Hearings					
ME	2	12		16	1
NH		1		3	1
MA		2	1	2	2
RI	1	2	2	2	1
CT	2	3		8	2
NY	3	2		5	2
NJ				4	
DE		1		1	
MD	1	1			2
PRFC		1	2	1	
VA		3			2
Hearing Total	**9**	**28**	**5**	**42**	**13**

Overview of Issues 3-4: A majority of commenters support either maintaining all management triggers or maintaining the management triggers based on spawning stock biomass and fishing mortality but revising the recruitment management trigger based on juvenile abundance indices. Comments suggested changing the recruitment trigger, which is triggered after three consecutive years of recruitment failure, to better reflect inherent variability in recruitment. Some comments also noted that required action in response to this trigger should be more specific than what is currently required.

A majority of comments support maintaining the 10-year rebuilding timeline with a few comments supporting a faster rebuilding timeline. Many comments noted concern there is not yet a rebuilding plan in place to address the current overfished status of the stock. Commenters noted the Board should adhere to this rebuilding requirement as specified in Amendment 6 and should act quickly to implement a rebuilding plan to address the overfished status tock by 2029 (10 years after the last benchmark stock assessment results were adopted for management use). Many commenters expressed a need for urgency to implement a rebuilding plan and take action in response to triggers more quickly.

Table 5. Comment summary for Issue 5: Regional Management.

Issue 5: Regional Management		
	Oppose Regional Mgmt or Not at this Time	**Pursue Regional Management in Am7**
Individual	145	23
Form Letter	599	4
Organization	26	9
Written Total	**770**	**36**
Hearings		
ME	16	
NH	6	
MA	4	
RI	3	
CT	8	
NY	9	2
NJ	1	3
DE	1	
MD	1	1
PRFC	1	2
VA		6
Hearing Total	**50**	**14**

Overview of Issue 5: A majority of commenters do not support pursuing regional management measures at this time either because the science (i.e., the two-stock assessment model) is not yet available or because they are opposed to regional management in general. Those opposed to regional management noted that striped bass as a migratory fish should be managed as one unit along the coast. Some comments also expressed concern about making the shift to regional management at a time when the stock is in poor condition. Many comments specifically stated this issue should be removed from consideration for Draft Amendment 7.

Those who favor pursuing regional management noted the need to account for regional differences for spawning and nursery areas. Most participants specifically referenced regional management for the Chesapeake Bay and some commenters also noted other spawning areas like the Hudson River and Delaware Bay.

Table 6. Comment summary for Issue 6: Management Program Equivalency (Conservation Equivalency).

Issue 6: Conservation Equivalency (CE)				
	Keep CE in FMP	**Only Use if Not Overfished/Not Overfishing**	**Importance of Accountability if Using CE***	**Eliminate CE from FMP**
Individual	21	114	105	100
Form Letter	4	1394	1345	503
Organization	10	19	13	9
Written Total	**35**	**1527**	**1463**	**612**
Hearings				
ME		10	10	6
NH		3	1	1
MA		2	2	5
RI	2	2	2	4
CT		8	8	5
NY	1		1	12
NJ	2	1	3	5
DE		1	1	
MD	1	4	5	
PRFC	2	1	1	
VA	3	3	3	
Hearing Total	**11**	**35**	**37**	**38**

**Subset of comments that support keeping CE or only using CE when the stock is not overfished and not experiencing overfishing. Was not counted for comments on eliminating CE.*

Overview of Issue 6: Individual comments were split between eliminating CE from the FMP or using CE only when the stock is not overfished and not experiencing overfishing. Across all comments received, the majority support the use of CE only when the stock is not overfished and not experiencing overfishing. Many commenters noted the importance of having measures in place to hold states accountable if they do not achieve their proposed reduction. There was general concern about the lack of accountability, inability to quantify and measure the effectiveness of CE programs, and the lack of management consistency among states.

Some comments generally support the use of CE and many of these commenters also noted the importance of having accountability measures in place. Some noted that having stronger accountability measures are a necessary condition to maintaining CE.

Table 7. Comment summary for Issue 7: Recreational Release Mortality.

Issue 7: Recreational Release Mortality				
	Angler Outreach/ Education	**Additional Gear Restrictions***	**Additional/ updated Research on Mortality Rates**	**Seasonal Closures for Env Conditions**
Individual	154	87	74	24
Form Letter	1345	1257	96	1245
Organization	27	12	11	11
Written Total	**1526**	**1356**	**181**	**1280**
Hearings				
ME	12	1	12	
NH	1	3	3	
MA	4	6	1	0
RI	8	2	5	1
CT	11	2	6	7
NY	9	4	1	2
NJ	5	4	3	
DE	1		1	
MD	2		6	2
PRFC	2		1	3
VA	3	3		2
Hearing Total	**58**	**25**	**39**	**17**

**Not including circle hooks.*

Overview of Issue 7: Most comments support increased outreach and education for topics including best handling practices and the use of circle hooks for recreational anglers. Some commenters suggested a video and test that could be required or could be opt-in for anglers getting a license to demonstrate knowledge of best handling practices. Many commenters support additional gear restrictions (beyond circle hooks) to address release mortality such as not allowing the use of treble hooks, gaffing, or barbs on hooks. Many commenters support additional research on release mortality rates for different fishing methods and gear types as well as updated release mortality estimates for the stock assessment model. Many commenters noted support for the ongoing release mortality study being conducted by Massachusetts Division of Marine Fisheries.

Some individual comments as well as some form letters noted support for seasonal closures, either during the summer or winter, to reduce recreational release mortality during conditions associated with higher release mortality rates. There were a few comments on measures to reduce effort like shortening the season or closing the fishery on certain days.

Table 8. Comment summary for Issue 8: Recreational Accountability.

Issue 8: Recreational Accountability				
	Too complex for Am 7 (e.g. multispecies)	**Oppose RHL/quota or not at this time**	**Start addressing rec accountability in general (e.g. better reporting, tag system)**	**Support pursuing RHL/quota system**
Individual	73	20	36	16
Form Letter	96	4	10	
Organization	11	14	12	3
Written Total	**180**	**38**	**58**	**19**
Hearings				
ME	1	11		
NH	1	1	2	
MA	2		1	
RI	2		1	
CT	6			1
NY	1	2	3	1
NJ				
DE	1			
MD			3	
PRFC			2	1
VA			2	3
Hearing Total	**14**	**14**	**14**	**6**

Overview of Issue 8: Relative to some of the other issues, this issue had fewer comments overall. The majority of comments on this issue noted that recreational accountability should not be included in Amendment 7 because it is a broader issue applicable to multiple species and/or it would distract from other issues in Amendment 7. Some comments did not support pursuing a recreational harvest limit (RHL) or other quota system at this time because reporting systems and data are not sufficient. There was general concern across all comments on this issue about the lack of reliability and uncertainty of MRIP data. Other comments were opposed to a quota system in general for the recreational striped bass fishery because there is already individual accountability through existing regulations. Some commenters also referenced challenges associated with fluke and black sea bass RHLs. Many comments specifically stated this issue should be removed from consideration for Draft Amendment 7.

Some comments support pursuing an RHL or quota system in Amendment 7 to hold the recreational sector to the same standard as the commercial sector. Some comments noted support for starting to address recreational accountability in general at this time, including pursuing new reporting technologies and better reporting systems as well as improving MRIP

data. Some commenters suggested having a striped bass stamp to fund better MRIP data collection to improve available data. There were also a few comments supporting the use of a tag system to limit recreational harvest.

Some comments noted concern about how this issue was presented in that it creates confusion between individual accountability and accountability through harvest limits for the sector as a whole.

Table 9. Comment summary for Issue 9: Coastal Commercial Quota Allocation.

Issue 9: Coastal Commercial Quota Allocation		
	Status Quo Allocation or Not in Am7	**Update Quota Allocation**
Individual	4	102
Form Letter		96
Organization	6	7
Written Total	**10**	**205**
Hearings		
ME		8
NH		2
MA		2
RI		2
CT		5
NY	1	2
NJ		
DE		2
MD		
PRFC		1
VA	2	1
Hearing Total	**3**	**25**

Overview of Issue 9: Relative to some of the other issues, this issue had fewer comments overall. The majority of commenters on this issue support updating the commercial quota allocation to a more recent timeframe to better align with current fishery conditions. A small number of commenters noted this issue should not be addressed in Amendment 7 or that commercial allocation should not be changed at this time.

Some commenters provided other comments related to commercial harvest or the commercial industry in general and these comment topics are included under Issue 10.

Common Comment Themes under Issue 10: Other Issues

The following tables and additional descriptions represent common themes from comments that were not directly related to Issues 1-9. Due to breadth of comments received, this overview does not represent the entirety of topics addressed by the public comments.

Table 10a. Common themes for Issue 10: Other Issues related to harvest control.

Issue 10: Other Issues—Harvest Control				
	Reduce Comm Quota or Temporary Ban on Comm Harvest	**Eliminate Comm Harvest (Gamefish status)**	**Moratorium on Comm & Rec Harvest**	**Permanent C&R only**
Individual	31	66	130	20
Form Letter		4	10	
Organization	2	5	1	
Written Total	**33**	**75**	**141**	**20**
Hearings				
ME		1	2	
NH	1			
MA	3	1	17	5
RI				1
CT			1	6
NY			4	
NJ	1		3	
DE				
MD	1		2	
PRFC				
VA				
Hearing Total	**6**	**2**	**29**	**12**

Additional Detail on Harvest Control Comments: Most comments related to harvest control supported a moratorium on all commercial and recreational harvest for some period of time. Suggested time periods ranged from 3 years to 10 years or until the stock is rebuilt. Some comments support designating striped bass a gamefish (recreational only with recreational harvest allowed).

There were also comments supporting a 1 fish bag limit for the entire coast with a variety of size limits proposed. For charter boats, some comments supported daily bag limits per boat instead of per person.

Table 10b. Common themes for Issue 10: Other Issues related to enforcement, net gear, and slot limits.

Issue 10: Other Issues—Enforcement, Commercial Gear, Slot Limits				
	Stronger Penalties for Poaching	**Increased Enforcement/ Funding**	**Slot limit concerns/Protect 2015 Year Class**	**Ban Comm Gill Nets/Comm H&L only**
Individual	46	52	25	41
Form Letter	10			10
Organization	2	3	1	2
Written Total	**58**	**55**	**26**	**53**
Hearings				
ME		1	1	
NH				
MA		15	4	
RI		1	1	
CT	2	2	4	
NY	4			
NJ	2	2	2	
DE				
MD		1		
PRFC				
VA				
Hearing Total	**8**	**22**	**12**	**0**

Additional Detail on Enforcement, Commercial Gear, and Slot Limit Comments: Many comments support increased funding for enforcement to increase their capacity and ability to patrol. There were also many comments in favor of stronger penalties for poaching. Some comments supported increased licensing fees or the concept of a striper stamp to raise funds that could be allocated to enforcement.

In addition to the comments supporting a ban on commercial gill nets noted in the table above, there were also comments supporting development of a metric for commercial discard mortality.

There were some comments expressing concern that the strong 2015 year class is approaching the slot limit and the slot limit should be reevaluated and potentially changed to protect this year class. Some comments expressed general concern about slot limits and potential effects on year classes.

Table 10c. Comment summary for Issue 10: Other Issues related to spawning protections, environmental factors, and research.

Issue 10: Other Issues—Spawning Protection, Environmental Factors, Research						
	Spawning Area Closures	**Individual Stocks Research**	**Climate Change/ Env Factors**	**Habitat**	**Men-haden, Forage Base**	**Human Dimensions Research**
Individual	31	52	27	16	46	45
Form Letter	12	96	1298	1247	1645	96
Organization	2	3	13	10	14	3
Written Total	**45**	**151**	**1338**	**1273**	**1705**	**144**
Hearings						
ME	1					8
NH						1
MA		2		1		2
RI		3				2
CT		3			2	3
NY	5				2	
NJ				2	3	
DE		2				2
MD			2	1	1	
PRFC			1			
VA			2		3	
Hearing Total	**6**	**10**	**5**	**4**	**11**	**18**

Additional Detail on Spawning Protection, Environmental Factors, and Research Comments: In addition to the comments in support of spawning area closures during spawning season noted in the table above, there were other proposed measures to protect pre-spawn and spawning fish and to protect large females:

- Close the spring season for a few years or permanently.
- Catch and release only during spawning season.
- Eliminate the trophy fishery.
- Ban harvest of fish over a certain size limit (range of sizes proposed).
- Address commercial harvest of large fish and consider the same size limits for the commercial and recreational fisheries.
- Enhance and protect spawning habitat.

Regarding stock research, there were many comments supporting additional studies of individual spawning stocks to determine their contribution to the coastwide population.

Comments on the impacts of climate change and environmental factors on striped bass noted that management needs to be able to respond to these changing factors to address their impact on striped bass mortality.

There were many comments noting the importance of menhaden and other forage species to the health of the striped bass population. Some comments support reducing menhaden harvest and others noted the importance of maintaining the striped bass BRPs since they are now connected to the ecological reference points (ERPs) for menhaden.

For human dimensions research, comments support social science research on the value of the striped bass recreational fishery, angler wellbeing, and angler values to help understand how anglers may respond to changing regulations or changing availability of fish.

Comments were submitted by the following groups and organizations:

American Saltwater Guides Association

American Sportfishing Association

Angler Action Foundation

Backcountry Hunters and Anglers, New England

Backcountry Hunters and Anglers, New York

Blue Planet Strategies

Cape Cod Salties Sportfishing Club

Center for Sportfishing Policy

Chesapeake Bay Foundation

Coastal Conservation Association, National

Coastal Conservation Association, New Hampshire

Congressional Sportsmen's Foundation

Delmarva Fisheries Association

Friends of the Rappahannock

Gotham Whale

Great Egg Harbor Watershed Association

Grey Owl Analytics

Hi-Mar Striper Club of Middletown, NJ

Long Island Commercial Fishing Association

Maine Association of Charterboat Captains

Maine Professional Guides Association

Maryland Watermen's Association

Massachusetts Striped Bass Association

Menhaden Defenders

Narragansett Surfcaster

National Audubon Society

National Wildlife Federation

Native Fish Coalition, Connecticut

Native Fish Coalition, Massachusetts

Native Fish Coalition, Maine

Native Fish Coalition, New Hampshire

North Fork Anglers Fishing Club

New York Coalition for Recreational Fishing

Plum Island Surfcasters

Recreational Fishing Alliance

Rhode Island Party and Charter Boat Association

Rhode Island Saltwater Anglers Association

Riverkeeper

Save the Bay

Stellwagen Bank Charter Boat Association

Stripers Forever

Tightlined Conservation Coalition

The Nature Conservancy

Theodore Roosevelt Conservation Partnership

Town of Wellfleet, MA Natural Resources Advisory Board

Twin Rivers Waterman's Association

Virginia Anglers Club

Virginia Saltwater Sportfishing Association

Virginia Waterman's Association

Wild Oceans

Comments were submitted via the following form letters:

Chesapeake Bay Foundation (1,245)

Theodore Roosevelt Conservation Partnership (503)

Menhaden Defenders (347)

Backcountry Hunters and Anglers (130)

American Saltwater Guides Association (96—three variations)

Wild Oceans (53)

Stripers Forever (12—four variations)

Form letters from unknown sources:

Form Letter 1 (5)

Form Letter 2 (6)

ANGLER ACTION NETWORK * BLUE PLANET STRATEGIES * GOTHAM WHALE * GREAT EGG HARBOR WATERSHED ASSOCIATION * MENHADEN DEFENDERS * NATIONAL AUDUBON SOCIETY * NATIONAL WILDLIFE FEDERATION * RIVERKEEPER * SAVE THE BAY * VIRGINIA SALTWATER SPORTFISHING ASSOCIATION * WILD OCEANS

Please accept these comments on the Public Information Document for Amendment 7 to the Striped Bass Management Plan on behalf of the signatories below.

Our primary concern is the Board's interest in proposed changes to the striped bass biological reference points (BRP). A more liberal spawning stock biomass threshold or target would clearly be detrimental to the long-term sustainability of striped bass, especially since the stock is currently overfished. Furthermore, as the coastwide menhaden quota is now tied to the new ecosystem reference points, which include striped bass, changes to the reference points could create cascading negative ecosystem effects.

Issue # 2, BRP: Stay the Course Until the Next Benchmark Assessment

The current striped bass BRP represents the best available science. Lowering the BRP bar at this time would be an unwarranted, capricious, and arbitrary decision not supported by science. As highlighted in the PID:

"*The SSB in 1995 was selected as the threshold because that was the year the Commission declared the stock recovered from its depleted status in the 1980s, and many desirable stock characteristics were achieved, such as an expanded age structure. The additional 25% buffer for the target was an ad hoc decision to account for uncertainty in the SSB estimates, and also produced a target value comparable to those observed prior to the stock's collapse in the 1970's.*"

The PID states that model-based alternatives to the current reference point are not available:

"*Potential alternatives to the current reference points are restricted by data and modeling limitations. Unfortunately, the statistical-catch-at-age (SCAA) model currently used in striped bass stock assessment is unable to produce reasonable estimates for model-based reference points, such as MSY or SPR (spawning potential ratio).*"

Issue #10, Ecosystem Based Management

In 2020, the ASFMC embarked on an ecosystem-based fishery management system for Atlantic menhaden. The "ecological reference points" which define this new approach are inextricably tied to striped bass reference points and the health of other Atlantic coast stocks (i.e., bluefish, weakfish, dogfish, and Atlantic herring).

While the Striped Bass Management Board may not necessarily be obligated to consider menhaden per se, it would be logical and reasonable to do so because striped bass are highly dependent on abundant menhaden. Lowering the striped bass biomass target will potentially lead to an increased quota for menhaden, and thus reduced forage for striped bass.

In 2017, when the Menhaden Management Board considered a decision to establish an ecological management system for Atlantic menhaden based on a "rule of thumb" management protocol, commissioners expressed concern that "menhaden-specific ecological reference points" were not yet ready for management use. The Board chose to wait for the Ecological Reference Points Working Group and the Technical Committee to make management recommendations.

This history is important because the Striped Bass Management Board is now considering changes to the Striped Bass Management Plan based on *ad hoc* concerns about the ability to meet the spawning stock biomass (SSB) target; however, this decision is not based on science. In fact, the PID succinctly points out that the fishing mortality rate has never been low enough to meet the SSB target.

It is also important to highlight that the Atlantic menhaden ERPs do not account for the overfished status of Atlantic herring. As Atlantic herring are another seasonally-important prey species for striped bass, their overfished status should be a significant concern for striped bass management. A depleted population of Atlantic herring will further stress the striped bass stock, particularly when in tandem with increased fishing pressures on both menhaden and striped bass.

For these reasons, we believe that the Striped Bass Management Board should remove biological reference points from consideration in Amendment 7. If the next benchmark stock assessment provides a viable model-based alternative to the current empirical reference points, then and only then would it be appropriate to consider any changes to striped bass reference points. In the meantime, the Board should focus on rebuilding the striped bass population and embrace the inter-relationships between striped bass and the new ecosystem-based menhaden management system.

Sincerely,

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April 9, 2021

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Dear Ms. Franke,

On behalf of America's 7.5 million striped bass anglers and the sportfishing industry, we appreciate the opportunity to provide comments to the Atlantic States Marine Fisheries Commission (ASMFC) regarding the Public Information Document for Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan.

Recreational anglers and the sportfishing industry recognize that a healthy striped bass population and fishery is critical to the east coast outdoor recreational economy and is a significant driver of angler engagement and participation along the Atlantic coast. While the population is significantly healthier than it was when the moratorium was enacted in the 1980s, recent declining trends in the population and its fishery continue to be a cause for concern. However, the sportfishing community stands by the cooperative process of the ASMFC and believes that the states and its stakeholders can rebuild the striped bass fishery together again.

To help assist ASMFC in developing a comprehensive Amendment 7 for Atlantic striped bass that is responsible to the resource and its fisheries, we submit the following comments on the Public Information Document.

1. Fishery Goals and Objectives – the current goals and objectives from Amendment 6 (outlined in the PID) provide a strong foundation for striped bass management. We make the following recommendations for consideration to help improve upon the existing goals and objectives.

Recommendations:

- Achieve the conservation goals while still allowing sustainable fishing access.
- Balance the needs of catch and release anglers with anglers who like to take a fish home.
- Stabilize the fishery with regulatory consistency across space and time.

2. Biological Reference Points (BRPs) – we support the current BRPs because they are adequate to achieve the current fishery goals and objectives especially considering that under these BRPs, the population was healthy in the mid-2000s. Further, as the PID highlights, model-based alternatives are not yet available for management use, providing additional support for using the current empirically based reference points. If alternative BRPs are considered in Amendment 7, we request that the Technical Committee conducts an analysis of any proposed alternatives so that stakeholders understand

the tradeoffs as they relate to the current BRPs and the healthy fishery and population achieved in the mid-2000s.

3. Management Triggers – We support management triggers as a great precautionary concept, but the metrics that we use to measure population status (e.g., F, SSB), and the underlying data used to produce those estimates, are highly variable as noted in the PID. This means that a management trigger could be tripped before the population has a chance to react to a previous corrective management action caused specifically by variability in the underlying data.

Recommendations:

- Finding a balance between being precautionary to ensure a healthy population while also maintaining stability in the fishery is the sweet spot for management triggers.
- All management triggers explored should be back tested to ensure that the conditions of a specific trigger will not be met so frequently that it causes regulatory instability.

4. Stock Rebuilding Target and Schedule – We understand fisheries science is not an exact science and Figure 1 in the PID shows how changes in data and modeling can substantially impact our understanding of the population and its BRPs. The most critical component of the fisheries management program for striped bass is to maintain F at the target level. However, F is not the only factor influencing the ability of striped bass to rebuild. History tells us that recruitment is important to rebuilding the population, and currently recruitment trends are down even when SSB was high (e.g., in the mid 2000s'). Therefore, other factors that we tend to have less control over (e.g., habitat and water quality) play a significant role in recruitment and the ability of SSB to rebuild and we encourage ASMFC to work to actively address those factors to the extent possible.

Recommendations:

- Establish a ten-year rebuilding plan that focuses on maintaining F at its target level
- To the extent possible, formally support improvements to habitat and water quality for striped bass.
- Allow for flexibility in the rebuilding timeline only if F has been maintained at its target level and the Technical Committee determines that factors other than F have contributed to a slow recovery of striped bass.

5 & 6. Regional Management and Conservation Equivalency – we have combined our recommendations on these topics because they both focus on management flexibility. Scientifically, management flexibility will add uncertainty at a time when we need to be maximizing our chance of achieving conservation goals while minimizing risk to the population. We understand that a coastwide science and management structure does not adequately account for the dynamics of a multi stock population and the availability of fish across the management unit (Maine to North Carolina). However, it is prudent to match our management approach with the resolution of the data that we have, especially for data sources where uncertainty is high. The current use of conservation equivalency for striped bass is not working because uncertainty in the underlying data used to justify these programs has resulted in the fishery frequently exceeding its F target. With a coastwide management structure, some states may incur more of the conservation burden, but that is because the availability of fish to those states is higher. Rebuilding the striped bass population will take many sacrifices, but hopefully with the

establishment of coastwide and Chesapeake Bay wide measures ASMFC can find regulations that maintain F consistently at its target.

Recommendations:

- Continue scientific exploration of a multi-stock model to improve understanding of population dynamics.
- Hold off on the implementation of regional management until a multi stock model has been approved for management use and the population shows signs of recovery.
- Restrict the use of conservation equivalency when the population is in a poor condition even if the states agree to state specific accountability because the variability in the catch data will create significant challenges to using it for annual accountability of conservation equivalency programs.
- Implement coastwide and Chesapeake Bay wide regulations for regulatory consistency and stability.
- Find regulations that consistently maintain F at its target. Hopefully, we are close to those long-term measures with the recent changes in Addendum VI.

7. Recreational Release Mortality – The popularity of catch and release fishing for striped bass combined with strict size and bag regulations creates a very high proportion of fish being released. However, this is nothing new in this fishery and Figure 4 in the PID shows that the proportion of fish released alive has been stable and high for decades. The sportfishing industry has focused on education and outreach campaigns to make anglers aware of techniques that can be used to increase the survivability of released striped bass. As stated in issue 1, all anglers play a role in helping rebuild striped bass.

Recommendations:

- In addition to the use of circle hooks when fishing with natural baits, we support the exploration of other common sense regulatory approaches for addressing release mortality.
- Continue to focus on education and outreach to address recreational release mortality.
- Make grant funding widely available to help bolster education and outreach on best handling practices for the benefit of all species not just striped bass.

8. Recreational Accountability – While perhaps not the intent of ASMFC, the term "recreational accountability" inappropriately suggests that challenges with recreational fisheries management are caused by recreational anglers being "unaccountable." In reality, anglers abide by the regulations and monitoring systems established by fisheries managers. Problems related to ensuring recreational landings are in accordance with conservation goals are generally due to limitations with catch survey designs and/or improper regulations; neither of which are the fault of recreational anglers. The uncertainty of recreational catch data creates significant challenges to fisheries science and management. Because of the variability in catch, a recreational harvest limit (RHL) approach, as is used in federal fisheries, is not a workable solution for achieving the goals and objectives of the striped bass fishery. The RHL approach will lead to management instability and will potentially cause drastic annual changes to regulations, likely attributed to data uncertainty rather than legitimate resource concerns. As evidence of the challenges with the RHL approach, AMSFC and the Mid Atlantic Fishery Management Council are jointly working on a recreational reform framework for federally managed fisheries with an overarching goal of addressing the current RHL approach's limitations in providing stability, flexibility, and accessibility in the fishery.

Recommendations:

- The subject of this section should be changed from "recreational accountability" to a more appropriate and less offensive term such as "achieving recreational harvest targets."
- Current limitations of recreational catch data make it difficult to measure accountability using an RHL on an annual basis.
- Use stock assessments that occur over 2–3-year intervals to assess changes to recreational catch and its impact on the population.
- Improve recreational catch data collection using electronic reporting and other programs supplemental to the Marine Recreational Information Program.

9. Coastal Commercial Quota Allocation – The PID explains that the commercial fishery has recently underperformed its quota because striped bass have not been available to be caught. That is further indication of the resource being in need of conservation.

Recommendation:

- Conservation efforts should be shared equally between the recreational and commercial sectors because everyone who uses the resource has a shared interest in its future.

10. Other Issues – The amendment needs to explore opportunities to enhance habitat to increase the likelihood of spawning success as mentioned in issue 4.

Thank you for the opportunity to comment.

Sincerely,

Michael Waine
Atlantic Fisheries Policy Director
American Sportfishing Association

Jeff Angers
President
Center for Sportfishing Policy

Richen Brame
Atlantic States Fisheries Director
Coastal Conservation Association

Chris Horton
Senior Director of Fisheries Policy
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Chris Macaluso
Center for Marine Fisheries Director
Theodore Roosevelt Conservation Partnership

AMERICAN SALTWATER GUIDES ASSOCIATION
BETTER BUSINESS THROUGH CONSERVATION

March 5, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of "better business through conservation," reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Atlantic striped bass, far and away the most commonly recreationally targeted species under ASMFC's jurisdiction,[1] embodies this philosophy. The outlook for our businesses hinges on a robust population of this iconic species from Maine to North Carolina, and with spawning stock biomass at a 25-year low,[2] the future is uncertain.

In principle, we are concerned with the initiation of a comprehensive amendment process when the striped bass fishery has far more urgent needs. The stock was declared overfished nearly two years ago, and while the Atlantic Striped Bass Management Board (hereafter referred to as the Striped Bass Board) took action to end overfishing through Addendum VI,[3] there has not yet been any discussion of a rebuilding plan, despite Amendment 6's own requirement that the stock be rebuilt within 10 years of being declared overfished.[4] Due to data uncertainties associated with the COVID-19 pandemic, it is uncertain whether Addendum VI's provisions were successful in curbing fishing mortality and putting the stock on a path to eventual recovery. Furthermore, some of the specific potential issues to be included in the amendment, such as Regional Management (Issue 5) and Recreational Release Mortality (Issue 7) are being considered for public input even as fisheries scientists are in the midst of research and modeling efforts to inform these issues.

All of this being said, we are aware that it is the will of the Striped Bass Board to move ahead with this amendment, and below we provide our thoughts on each of the issues presented in the PID.

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[1] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, February 28, 2021.
[2] ASMFC. 2019. Summary of the 2019 Benchmark Stock Assessment for Atlantic Striped Bass. http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport_April2019.pdf.
[3] ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf.
[4] ASMFC. 2003. Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass. http://www.asmfc.org/uploads/file/sbAmendment6.pdf.

Issue 1: Goals and Objectives

We believe that the current goal and objectives of the Atlantic Striped Bass FMP, as stated in Amendment 6, continue to be appropriate for striped bass management. A robust spawning stock characterized by a broad age structure is critical for reducing recruitment variability for a species whose spawning success largely depends on favorable environmental conditions.[5] Such a diversity of age classes promotes long-term stock health and stability, which in turn supports the health and stability of commercial and recreational fisheries. Such stock stability is a first-order concern, far more important to our coastal fisheries than management stability or flexibility.

Given the suitability of the current goal and objectives for striped bass management, **we recommend that this issue be removed from further consideration for inclusion in Amendment 7.** We believe that the goal and objectives are not the problem, but instead the fact that the Striped Bass Board has not adhered to them in its actions over the past decade.

Issue 2: Biological Reference Points

Before addressing this issue, we first want to express our disappointment with the Striped Bass Board's inclusion of the following sentence on page 7 of the PID: "Given the 2018 benchmark assessment found overfishing was occurring and the SSB was below the target even during those years that the striped bass population was at a historically high level, the current reference points may be unattainable given current objectives for fishery performance." This sentence is editorial in nature, is based on speculation rather than science, and is fundamentally misleading to members of the public without a background in fisheries science who depend on the PID to provide a transparent and neutral accounting of the issues that are up for consideration.

With regard to the issue of Biological Reference Points, ASGA supports the best available science, but recognizes that due to the absence of a stock-recruitment relationship and the fact that model-based reference points are not available, we must instead consider "empirical" reference points based on a given year. We continue to believe that 1995 is an appropriate reference year given the abundance and broad age structure of the striped bass population at that time, in accordance with Amendment 6's goal and objectives. Contrary to the editorial comment in the PID, the most recent stock assessment's finding that overfishing was occurring even when the stock was at this high level suggests that if fishing mortality is controlled, we may well be able to achieve the current target level (125% of 1995 spawning stock biomass). While some have criticized the 1995 reference points as arbitrary, any other reference points selected now, in the absence of model-derived reference points, would also be arbitrary. The rationale for using 1993 as a potential alternative reference year (with lower threshold and target values) "because SSB was lower than in 1995 but still produced a strong year-class" is flawed given the lack of a stock-recruitment relationship for striped bass unless the stock is at very low levels. **We believe that 1995 remains an appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7.** The fact that the Striped Bass Board has failed to maintain a healthy striped bass stock is not a suitable reason for lowering the goalposts.

[5] Secor, D.H. 2000. Spawning in the nick of time? Effect of adult demographics on spawning behaviour and recruitment in Chesapeake Bay striped bass. ICES Journal of Marine Science 57: 403–411. doi:10.1006/jmsc.1999.052.

Issue 3: Management Triggers

As with Issue 2, we were disappointed to see another instance of editorializing, without the presentation of any scientific evidence, included in this section of the PID, on page 11: "The latest science also indicates that the SSB target has never been reached which raises questions that it may be an unreasonably high management target given current objects [sic] for fishery performance and changing or altered ecosystem conditions (e.g., climate change, and changes in other predator and prey population abundance)."

We are of the view that the four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management and that—if adhered to by the Striped Bass Board—they will promote the long-term health and stability of the species. We are puzzled by the statement on page 11 that the Striped Bass Board is criticized for having "knee-jerk" reactions to point estimates of fishing mortality given that coastwide recreational regulations have only changed twice since Amendment 6 was implemented in 2003 (Addendum IV in 2014 and Addendum VI in 2019).[6,7] **We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.** Identifying recruitment failure is critical for enabling the Striped Bass Board to anticipate future reductions in striped bass availability and adjust regulations accordingly. A metric that better buffers against inherent interannual recruitment variability, such as a three-year rolling average rather than the individual index values for each year, could be a better indicator of whether there is a problem. In addition, because such poor recruitment will eventually affect the abundance and/or size distribution of striped bass available to the fishery, we recommend that this trigger require stronger action of the Striped Bass Board than simply "to review the cause of recruitment failure and determine the appropriate management action."

Issue 4: Stock Rebuilding Target and Schedule

We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. A longer rebuilding timeline would not only extend the period during which the stock is not at the target level, but would also inject greater uncertainty regarding the outcome of the rebuilding process. Both of these scenarios present a threat to the commercial and recreational businesses that depend on a healthy and stable striped bass population.

In addition, we are strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7. The stock, according to Amendment 6, must be rebuilt to the target level by 2029, but the Striped Bass Board has only addressed curbing fishing mortality through Addendum VI (the effectiveness of which is uncertain due to pandemic-induced data limitations for 2020), and has yet to address the larger issue of rebuilding. In the interim, we are concerned that the stock will continue to languish, and foresee that, if rebuilding is not addressed in the Amendment, the Striped Bass Board may not elect to take action to rebuild the stock until the 2022 stock assessment update, which could restart the rebuilding timeline and extend it until 2032.

[6] ASMFC. 2019. Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/54d2aa96AtlStripedBassAddendumIV_Oct2014.pdf.
[7] ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf.

Issue 5: Regional Management

Ideally, striped bass would be managed at the individual stock level to ensure that each of the spawning populations along the U.S. east coast meets the characteristics of a healthy striped bass stock outlined in Amendment 6's goal and objectives. However, the two-stock SCAA model, which could be used to develop separate reference points for Chesapeake Bay and the "mixed ocean stock," is not yet ready for management. In addition, our understanding of the relative contributions of individual spawning populations to fisheries up and down the coast remains incomplete, although genetic approaches offer promise for such determinations moving forward.[8] In the absence of such stock discrimination capabilities, the Striped Bass Board would need to enact coastwide management measures to protect the most vulnerable stock in this mixed-stock fishery. Furthermore, we contend that at this time, when the striped bass stock is at a 25-year low, we should be focused on rebuilding the stock using the tools at our disposal, rather than considering a fundamental shift in management approach. **Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.** With the Striped Bass Board having recently demonstrated its lack of ability to prevent even a single stock from becoming overfished; now is not the time to consider parsing that stock into multiple management units

We also would like to raise our concern with the statement on page 12 that Chesapeake Bay's striped bass catch is heavily male-skewed. The statement appears to be made in an effort to potentially justify having different (higher) fishing mortality reference points in Chesapeake Bay due to the preponderance of males; however, no source to substantiate that claim is provided. While Kohlenstein (1981) surmised that most male striped bass spend their entire lives in Chesapeake Bay and that females emigrate at age 3,[9] multiple studies have since challenged this claim. Most recently, Secor et al. (2020) determined that both males and females depart Chesapeake Bay at sizes of over 80 centimeters.[10] And while observed sex data in Chesapeake Bay do indicate a majority of males at the sizes commonly encountered in the recreational fishery,[11] it is unclear whether the sex sampling occurs in the same areas as the recreational fishery, which is important given potential sex-specific patterns of occurrence in Chesapeake Bay. We urge the Striped Bass Board to refrain from continuing to state that most striped bass caught in Chesapeake Bay are male—and thereby that regional management with Chesapeake Bay-specific fishing mortality reference points may be justified—without providing supporting evidence.

Issue 6: Management Program Equivalency (Conservation Equivalency)

We are not unconditionally opposed to the notion of conservation equivalency (CE) in circumstances where the striped bass population is healthy and in areas/times when the characteristics of the striped bass population are unique (e.g., smaller striped bass in Chesapeake Bay). However, we also believe that CE can be abused by individual states in a way that jeopardizes the effectiveness of coastwide

[8] LeBlanc, N.M., et al. 2020. Genomic population structure of Striped Bass (*Morone saxatilis*) from the Gulf of St. Lawrence to Cape Fear River. Evolutionary Applications 13(6):1468-1486. doi:10.1111/eva.12990.
[9] Kohlenstein, L.C. 1981. On the Proportion of the Chesapeake Bay Stock of Striped Bass That Migrates into the Coastal Fishery. Transactions of the American Fisheries Society 110:168–79.
[10] Secor, D.H., et al. 2020. Differential migration in Chesapeake Bay striped bass. PLoS ONE 15(5): e0233103. doi:10.1371/journal.pone.0233103.
[11] National Marine Fisheries Service. 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. Northeast Fisheries Science Center Reference Document 19-08. https://repository.library.noaa.gov/view/noaa/23031.

conservation efforts. For example, New Jersey's CE provisions under Addendum VI gave its anglers the ability to harvest striped bass less than 28 inches and greater than 35 inches, undermining the goal of protecting fish outside of the coastwide 28-35 inch slot limit.[12] By the same token, the greater management uncertainty resulting from CE (since no two regulations can truly be "equivalent" in terms of fishery impact) can compromise coastal conservation success, as seen by the fact that, after accounting for CE in the implementation of Addendum VI, the fishery only had a projected 42% probability of meeting the necessary 18% reduction in mortality (as opposed to a 50% chance of doing so before CE).[13]

We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives. While some states may object to such a need for accountability and point to the high levels of uncertainty inherent in state-specific MRIP estimates, we contend that if MRIP estimates are suitable for projecting removals based on CE, then they should be suitable for accountability purposes as well. On a related note, we are puzzled by this statement on page 14 of the PID: "It is challenging to evaluate the effectiveness or success of CE programs once implemented because of the difficulty in separating the effects of the CE program from other factors like angler behavior and availability of fish that determine the amount of catch and release (see Issue 7 and Issue 8 on page 16 and 19, respectively) that occurs." In our eyes, the challenge of disentangling the effectiveness of CE programs is no different than disentangling the effectiveness of *any* management program from factors such as angler behavior and fish availability, and in no way negates the need for accountability. Rather, it highlights the need for human dimensions studies to assess how changes in regulations and fish availability may impact angler effort and, ultimately, fishing mortality (see Issue 10).

Issue 7: Recreational Release Mortality

As the PID illustrates, recreational release mortality has always been a part of the recreational striped bass fishery, and it always will be with any fishery that is primarily recreational and primarily catch-and-release. Table 3 in the PID shows that the annual number of removals due to recreational release mortality has been relatively consistent since 1995, indicating that the release mortality levels that we see today are not incompatible with a healthy fishery. That does not mean that it is not important to continue to work toward reducing release mortality, and we continue to support research and angler education to achieve that goal. The Striped Bass Board, however, must recognize that such release mortality should not be considered "waste" given the fact that many striped bass fishermen voluntarily release their catch and derive a benefit from catch-and-release fishing—an attitude that is a significant driver of the recreational striped bass fishery and economy. The high proportion of fishing mortality attributed to recreational release mortality, despite the relatively low 9% assumed post-release mortality estimate, is a testament to the immense amount of angling activity oriented around catch-and-release fishing.

We do believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, **if**

[12] ASMFC. 2020. Next Steps for Management. Memorandum from Max Appelman to the Atlantic Striped Bass Management Board. http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC_Report_April2020.pdf.
[13] Ibid.

the Striped Bass Board is committed to taking action now, we recommend that such efforts focus on outreach and education to anglers in order to promote best practices for safe release (ASGA is able and willing to serve as a partner in this effort). We are not unconditionally opposed to specific effort reductions (time and area closures) should research and projections demonstrate that such actions would have a significant positive conservation impact; however, given the value we place on the opportunity to target striped bass, we would prefer to only use this approach as a last resort.

Issue 8: Recreational Accountability

We recognize that the commercial sector, which fishes under hard quotas, is far more accountable for its share of striped bass fishing mortality than is the recreational sector, and fundamentally believe that improving recreational accountability is critical for ensuring the long-term vitality of the striped bass fishery. That being said, recreational data collection efforts such as the Marine Recreational Information Program are not suitable for in-season monitoring. While a Recreational Harvest Limit (RHL) would in theory be an ideal way to promote such accountability, we are aware of the challenges inherent in this system as well (e.g., "chasing the RHL"), which the Mid-Atlantic Fishery Management Council is currently addressing through its Recreational Reform Initiative.[14]

The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. **As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).**

Issue 9: Commercial Allocation

While we generally would not comment on commercial allocation issues, it does appear that the landings period used for allocation, which dates back nearly 50 years, is woefully out of date. **We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.**

Issue 10: Other Issues

Research Needs

In recent years, social scientists have increasingly focused on the human dimensions of recreational fisheries—quantifying, for example, the relative contributions of various fishing activities (e.g., harvest or catch-and-release) to angler wellbeing. Such studies can also be used to better predict how changes in regulations and fish availability can impact fishing effort and fishing mortality. For a species that experiences enormous recreational fishing effort such as striped bass, human dimensions research could be immensely helpful for characterizing angler preferences and values, determining optimal management alternatives, and forecasting fishery impacts in the absence of in-season monitoring capabilities. Indeed, several studies have examined such questions for striped bass

[14] Mid-Atlantic Fishery Management Council. Recreational Reform Initiative. https://www.mafmc.org/actions/recreational-reform-initiative (Visited February 28, 2021).

specifically.[15,16] However, the Striped Bass Board rarely, if ever, acknowledges such research, let alone considers it for use in management. **We recommend including in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and providing a pathway by which such research could be applied to future management discussions.**

Under Issue 5, we mentioned continued efforts (e.g., genetic research) to better understand the relative contributions of individual striped bass stocks to the overall coastal population targeted by anglers. **We recommend that the Striped Bass Board support such stock discrimination research wherever possible, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.**

Striped bass are the foundation of the recreational fishing community and economy along the east coast. Ensuring a healthy population is critical for ensuring that our businesses are able to thrive. We urge the Striped Bass Board to put the resource first as it navigates the Amendment 7 process.

We thank you for your consideration of our comments.

Sincerely,

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[15] Carr-Harris, A., and S. Steinback. 2020. Expected Economic and Biological Impacts of Recreational Atlantic Striped Bass Fishing Policy. Frontiers in Marine Science (6). doi:10.3389/fmars.2019.00814.
[16] Murphy, R.J., et al. 2019. Angler attitudes explain disparate behavioral reactions to fishery regulations. Fisheries 44(10):475-487.

BACKCOUNTRY HUNTERS AND ANGLERS

April 9, 2021

To Emilie Franke, Fishery Management Plan Coordinator, ASMFC

Re: BHA Comments on the Amendment 7 Public Input Document (PID)

As the fastest growing organization of hunters and anglers in the nation, Backcountry Hunters & Anglers (BHA) seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. As BHA's footprint has expanded the application of our mission has also grown to cover the unique wildlife and outdoor heritages in every corner of our continent. Here in the Northeast, and specifically in our coastal areas, fishing for Atlantic Striped Bass is as much a part of our outdoor heritage as any pursuit in our region.

The current state of the Atlantic Striped Bass fishery is very concerning to our members in the Northeast. In 2003, the ASMFC enacted Amendment 6, which set goals and objectives for the Atlantic Striped Bass fishery that are based on stock levels achieved in 1995 when the fishery was declared recovered. In 2018 the ASMFC released a Stock Assessment Overview on Atlantic Striped Bass that indicated that the previously recovered Striped Bass stock was now considered overfished and that overfishing was still occurring. As anglers, the abundance of Striped Bass in our region, or lack thereof, has been reflected in our on-the-water observations as well. The guiding sentiment that will be followed in our comments is that **we believe that the goals and benchmarks originally established in Amendment 6 should be maintained and are achievable with the responsible management of the Atlantic Striped Bass fishery, and that the focus of Amendment 7 should be on recovering the Striped Bass stock and establishing a plan to achieve and sustain these goals and benchmarks.**

With these things in mind, our comments on many of the specific issues listed in the PID are included below:

Issue 1: Fishery Goals and Objectives

We believe that the goals and objectives that were established in Amendment 6 should be preserved. Specifically, maintaining a broad age structure and providing for the restoration and maintenance of essential habitat are vital to perpetuating a healthy and sustainable population of Atlantic Striped Bass.

Issue 2: Biological Reference Points

We believe that the 1995 stock estimate of female spawning stock biomass (SSB) continues to be the appropriate reference point to set stock target and threshold values. Regarding Biological Reference Points (BRPs), the PID mentions several other reference frameworks, but that each of these alternatives is restricted by data and modeling limitations and as a result they are not available for management use at this time. As a result, and until a better population/stock estimating tool becomes available, we support continuing to use female SSB as the fishery's BRP.

We also believe that 1995 continues to be the appropriate benchmark to determine SSB target and threshold. Prior to that time, all models presented in the draft PID Indicated that the Atlantic Striped Bass fishery was

depleted but recovering. An active effort towards recovery is apparent in Figure 2, which shows a fishing mortality rate consistently below target prior to 1995. After the fishery was declared recovered in 1995, overfishing began occurring promptly and has continued without correction ever since. All SSB models show that the fishery persisted above target SSB for well over a decade despite the failure to correct over-target fishing mortality, suggesting that a healthy stock has the resiliency to weather tough conditions for a short period of time. No data are presented, nor are we aware of any other data suggesting that the Atlantic Striped Bass stock is incapable of achieving the 1995 female SSB benchmark if properly managed.

Issues 3: Management Triggers

We believe that the management triggers that were set forth in Amendment 6 represent adequate safeguards to maintain a sustained Atlantic Striped Bass fishery if followed. As we mentioned in Issue 2, a review of the female SSB following restoration in 1995 that is viewed in the context of excessive overfishing shows that a spawning biomass of that size is resilient enough to endure some pressure from anglers for several years. However, the management triggers set forth are only as good as the correction that they result in. Based on the charts presented in Issue 2 it appears that nearly every management trigger was activated at some point since the enactment of Amendment 6 in 2003. The lack of consistent correction, including the failure to initiate a 10-year rebuilding plan, following management triggers being activated is highly concerning and presents a fundamental issue that must be addressed by the ASMFC if the fishery is to be restored and managed sustainably.

Issue 4: Stock Rebuilding Target and Schedule

Because Striped Bass are slow to mature and reach spawning-age at around 9 years of age, we feel that a 10-year timeline to reach the target that we stated in Issue 2 is appropriate. Given that the fishery has been mismanaged for an extended period of time and is currently both below threshold SSB and is experiencing excessive fishing mortality, we realize that strong action might be required to achieve stock rebuilding within this timeframe. Regardless, we feel that Amendment 7 should include a rebuilding plan to restore the female SSB to a recovered state within 10 years and should commence immediately.

Issue 5: Regional Management

Effectively implementing a regional management program would require considerable improvements to our ability to monitor and track individual spawning stocks throughout their migratory range, and in regional and state-by-state tracking and reporting of angler effort. At a time when the fishery as a whole is depleted and needs to be recovered, and because there is not currently a proven model that would allow for effective management of multiple stocks we do not believe that regional management programs should be pursued as part of Amendment 7.

Issue 6: Management Program Equivalency (Conservation Equivalency)

As stated in the PID, Conservation Equivalency (CE) has been a fixture in the management of Atlantic Striped Bass since 1995 when the fishery was declared restored. Allowing states to tailor their management plans based on the size and availability of fish to result in equivalent conservation impact is a reasonable privilege to offer during times when a healthy fishery is being managed sustainably. However, during times when a fishery must be recovered CE introduces an excess of variables and complicates data modeling on a fishery-wide basis. Therefore, we believe that during times when the fishery stock is below its BRP threshold and must be recovered that CE should not be allowed.

Issue 7: Recreational Release Mortality

Presumably recreational release mortality was singled out as the "lowest hanging fruit" because an extremely large proportion of anglers release bass alive and the subsequent release mortality constitutes a large proportion of the total fishing mortality, and because other causes of mortality can be controlled more directly with bag and size limits. We believe that the vast majority of anglers who pursue Atlantic Striped Bass and release them alive, whether they do so by choice or because fish are not of legal size to keep, do so with good intentions. With this in mind, we believe that if this issue is included in Amendment 7 it should prioritize providing the best available resources and education on tackle choices, catch-and-release techniques and situational awareness to reduce release mortality rather than reducing effort in the catch-and-release segment of the fishery.

Issue 8: Recreational Accountability

Effectively implementing Recreational Harvest Limits would require considerable improvements in the timeliness and accuracy of reporting recreational harvest on a state-by-state basis, and is also complicated by the fact that local conditions like salinity and temperature can play a significant role catch-and-release mortality from recreational angling. Continuing to improve the timeliness and accuracy of reporting and our understanding of release mortality should be a priority for fishery managers in general, but at this time we do not believe that implementing Recreational Accountability should be included in Amendment 7.

Ensuring our heritage of fishing for Atlantic Striped Bass relies on having a healthy and abundant stock of fish in the water, so we urge the ASMFC to make achieving previously recovered levels a priority as Amendment 7 comes in to focus.

Thank you for the opportunity to provide input, and for your consideration of our comments.

Sincerely,

Michael Woods
Saunderstown, RI
Chair, New England Chapter Board
Backcountry Hunters and Anglers

and the undersigned representatives of Backcountry Hunters and Anglers

New England Chapter Board
Backcountry Hunters and Anglers
newengland@backcountryhunters.org

Christopher Borgatti – Newbury, MA
John Simoneau – Durham, ME
Alex Gust – Plainville, CT
Matt Breton – Charleston, VT
Heather Kusmierz – Bow, NH

New York Chapter Board
Backcountry Hunters and Anglers
newyork@backcountryhunters.org

Glen Stratton (Chair) – Pulaski, NY
Kelly Buchta – Roscoe, NY
Michael Poulopoulos – Sand Lake, NY

To: ASMFC Board of Directors
From: Jack Creighton, Cape Cod Salties Sportfishing Club
Date: April 5, 2021

Dear Board Members,

Thank you for accepting our comments. I am currently the president of the CC Salties Sportfishing Club, and in a former life, I was a police officer for thirty years, serving the last fifteen as police chief in a MA town. I am very familiar with long-range planning, and with something as important as the condition of the striped bass fishery, a ten-year plan is not acceptable, from a management point of view. The commission has likely already made up its mind on the direction it will take, but I still feel that recreational fisherpeople must speak up if they ever have a chance of being heard. We must encourage recreational anglers to try to get seats on their states' boards.

As stated above, I am a former first responder, and I feel our first response, with the fishing season starting in less than 30 days in some states, must be education. We have to encourage the fisherpeople to use proper gear. If they are going to release the fish back into the water, do so as quickly as possible. Have the camera ready if photos will be taken.

Here are my responses to some of the issues.

Issue 2. I believe that 1995 is an appropriate reference year and that the biological reference points should remain unchanged.

Issue 4. I am in favor of continuing the ten-year plan as put forth in Amendment 6, since we are already two years into it, even though I said above that I do not favor ten-year plans.

Issues 5 and 6: I don't think all thirteen states have shown the ability to use good judgment for the striped bass in either regional management decisions or conservation equivalency decisions.

Issue 7: As you know the MA DMF is in the process of doing several years of study on various fishing styles and gear, so I don't know if this should be in Amendment 7 yet. But with recreational release, I feel that education on the proper handling of fish is the way to go. I have seen the word "discard" used in many of the Zoom seminars I have attended over the last months, but I do not regard fish I catch and release as discards. I would encourage all fisherpeople, both those who fish and those who don't fish but are in the business, to avoid the term discard, if we are trying to educate the fishing public on the proper release of fish. It would be great to know the effect that last year's slot limit had on striped bass mortality. Maybe we'll get a better read on that this year with better record keeping. One thing to monitor is the

new program in RI on data entry, with volunteers committing to enter data daily on the fish caught.

Issue 8: With all of the issues regarding all catchable fish in the Northeast, I question MRIP numbers and any time there is a 100% jump in the number of fish caught, it is hard to have faith in the organization responsible for it. The bottom line in any of this should be accountability. The number of striped bass that are caught and the number released should be accurate numbers. Until we can get to that level, we are in big trouble.

Issue 10: We feel that the commercial fishery should have to account for the fish they release back into the water that do not meet the 35" requirement.

Other Issues: I feel that the fishery - recreational, commercial, and managers - must do a better job with accountability for the number of fish that are in the water. I do the scale program for the state of MA. There are three pins awarded – bronze for 250, silver for 500, and gold for 1,000. Several of us have the gold pin, which means we have sent in 1,000 samples of bass that we caught and took at least six or seven scales from. It depresses me to know, according to current info, that 90 of my fish died as a result of my releasing them back into the water. The study being done by MA DMF, in its second or third year, might have information that will correct or give us a better idea of how many of these fish actually die. I cannot emphasize how much we feel education has to be started immediately with the increase in the number of anglers up and down the coast, if we want this sport to survive.

Thanks for your consideration.

Sincerely,

Jack Creighton
10 Homer Ave.
South Yarmouth, MA 02664

CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

April 9, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200A-N
Arlington, VA 22201

RE: Comments on Public Information Document for Amendment VII to the Interstate Fishery Management Plan for Atlantic Striped Bass

Submitted via email only to: comments@asmfc.org

Dear Ms. Franke:

On behalf of the Chesapeake Bay Foundation (CBF), we wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment VII Public Information Document (PID). CBF is the largest conservation organization dedicated solely to saving the Chesapeake Bay. Our motto, ***Save the Bay***, defines the organization's mission and commitment to reducing pollution, improving fisheries, and protecting and restoring natural resources such as wetlands, forests, and underwater grasses. CBF has more than 300,000 members who support the wise management of the region's living resources.

Striped bass are one of the most iconic species in the Chesapeake Bay region. Both Maryland and Virginia have designated the species as their state fish.[1, 2] From a biological perspective, spawning activity in the Chesapeake Bay accounts for over 70 percent of the coastal migratory striped bass population.[3]

Unfortunately, the recent benchmark stock assessment paints a concerning picture for the current status of the striped bass population with the stock being both overfished and currently experiencing overfishing.[4] The current stock status is both a symptom of recent management choices as well as a call

[1] Chesapeake Bay Program. Striped Bass. https://www.chesapeakebay.net/issues/striped_bass. Accessed 10/4/2019.
[2] Code of Virginia. § 1-510. Official emblems and designations.
[3] NOAA. Chesapeake Bay Office. Striped Bass. https://chesapeakebay.noaa.gov/fish-facts/striped-bass. Accessed 10/6/19.
[4] Northeast Fisheries Science Center (NEFSC). 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-08; 1170 p.

to action. Amendment VII provides a tremendous opportunity for the Atlantic Striped Bass Management Board (Board) to chart a course for rebuilding striped bass and improving the management of this critically important fishery. We urge the Board to consider the following comments and recommendations in further developing Amendment VII to the striped bass fishery management plan (FMP). We have ordered our comments on the issues presented in the PID in order of priority.

Biological Reference Points

Above all others, the issue of biological reference points is the most important issue considered in the PID. Biological reference points are how managers translate the goals and objectives of an FMP into practice. As such, it is critical that they reflect the values and principles that underlie those goals.

The current biomass target (125% of 1995 biomass) and threshold (1995 biomass) represent a time period in which the stock was considered rebuilt and exhibited stock characteristics that support the FMP goals and objectives, like expanded age structure. The Board chose the 125% target in order to account for uncertainty inherent in the management of any coastwide stock.[5] As a result, this was a period of unprecedented abundance of striped bass and reflects a population biomass we should strive to achieve not only for its success ecologically, but also for the many benefits that would accrue to coastal communities.

The PID states that the current biological reference points are being reconsidered because the target biomass has not been achieved. Based on that result, some posit that the biomass target is too high to be achieved. This argument fails to acknowledge that since 1995, managers have been unsuccessful in efforts to rein in fishing mortality to its target rate. Between 1996 and 2017 striped bass mortality has been above the target every year and, even more troubling, fishing mortality often met or exceeded the threshold. For more than 60% of the time since the stock was declared rebuilt, overfishing has been occurring.[6] This is a critical point as the target fishing mortality rate is directly linked to achieving the biomass target; if the population is fished above the target fishing mortality rate it is impossible to achieve the biomass target, regardless of recruitment, natural mortality, or other environmental challenges.

Alternative model-based reference points for striped bass, while under development, are not currently available for management use. We support the Technical Committee's continued work to develop such reference points for the striped bass stock, but until such alternatives are ready for the Board's consideration, there is no justification for changing the current biological reference points.

Considering the long history of excess mortality, ASMFC should focus on ensuring fishing mortality is reduced to appropriate levels in order to allow the age structure of the population to expand. The restored fishery characteristics identified by the 1995 population which are reflected in the current reference points are commonly considered the most important to stakeholders and the striped bass population and directly support the goals and objectives of the FMP.

[5] ASMFC Public Information Document for Amendment VII to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2021.
[6] ASMFC. Atlantic Striped Bass Stock Overview. http://www.asmfc.org/species/atlantic-striped-bass.

Fishery Goals and Objectives

Fishery goals and objectives are a critical part of the fishery management plan that set the context for what the remainder of the plan seeks to achieve. Current goals and objectives in the striped bass fishery reflect the collective desire of anglers, commercial fishermen, and managers to support fisheries while maintaining a precautionary approach to management in response to prior experience with the striped bass moratorium. The objective to manage the striped bass stock to the target is a critical management objective that should be the default for all fishery management plans.

The three FMP objectives identified by managers – stability, flexibility, and consistency – are fundamentally at odds. A fishery that is managed for stability lacks flexibility; a fishery that is managed for flexibility lacks consistency; and fishery that is managed for consistency lacks flexibility. They cannot all be achieved simultaneously. Stock status may be an appropriate metric to determine which management objective is most important at any given time. However, managers must keep in mind the overarching objectives of the FMP to maintain a large population biomass with a broad age structure and ensure that the management is tailored to meet that goal regardless of whether stability, flexibility, or consistency is driving the decision-making.

Given the current status of the striped bass stock, it is inappropriate to prioritize management flexibility at this time. With an overfished stock that is experiencing overfishing, the priority must be on stock rebuilding and reducing fishing mortality rates. Furthermore, because the ongoing COVID-19 pandemic has significantly changed angling patterns, delayed or canceled many of the necessary striped bass surveys, and delayed the upcoming stock assessment, these goals must take a back seat until the stock is at or above the threshold and moving in a positive direction to achieve target biomass within the rebuilding timeframe (10 years). If and when those objectives are accomplished, the Board can revisit the concepts of management flexibility and stability to determine if they can be carried out in a way that enhances striped bass conservation moving forward.

Finally, significant strides have recently been made to advance ecosystem-based fisheries management of menhaden through the development and adoption of ecological reference points. Through that process, menhaden reference points were directly linked to striped bass reference points as striped bass were the most sensitive fish predator identified in the intermediate complexity model. In this way, striped bass serves as a proxy for a number of other fish and piscivorous birds who are reliant on menhaden. Amendment VII should include additional goals and objectives that strive to support continued ecological management and recognize that striped bass serve as an important sentinel species in ecological models. Significant changes to striped bass management must be weighed carefully as they could affect the availability of forage for other predator species.

Management Program Equivalency (Conservation Equivalency)

Even though conservation equivalency has a long history in striped bass management, it is time to reconsider the widespread use of conservation equivalency in the management of the striped bass fishery. Given the current status of the stock, and the myriad conservation equivalency proposals that

have recently been considered by the Board, it is clear that the current conservation equivalency program is taking the focus off the goal of a healthy striped bass population along the Atlantic Coast.

Unfortunately, poorly planned conservation equivalency proposals have all too often resulted in less than intended conservation benefit with few consequences for the managers who developed them. A prime example of is the Chesapeake Bay region where Maryland's conservation equivalency proposals failed to meet their intended conservation goals. During the implementation of Addendum VI to Amendment VI to the Interstate Fishery Management Plan for striped bass, thirteen states submitted conservation equivalency proposals for the recreational fishery. The types of management measures included in those proposals have greater inherent uncertainty than simpler bag and size limits. The parsing of coastwide data into state- and Wave-specific datasets results in greater risk and uncertainty of achieving conservation goals with little to no accountability possible. Follow-up surveys and supplementary data collection needed to validate model assumptions is not required. Additionally, the implementation of conservation equivalency results in a lack of regulatory consistency across regions, a notable result of Addendum VI in Chesapeake Bay.

When the striped bass stock is overfished or overfishing is occurring, the use of conservation equivalency should be prohibited. The risks to the stock are too great to allow a piling on of additional uncertainty through the use of conservation equivalency. Many anglers are willing to make the sacrifices necessary to ensure rebuilding of striped bass within the prescribed timelines, but when the use of conservation equivalency puts that rebuilding in question, it undermines good faith efforts of anglers to be good stewards of the stock.

Even when stock status is less concerning, additional measures should be taken to ensure conservation equivalency is implemented in a transparent, accountable way. Specifically, we recommend the following:

- States may only use conservation equivalency if their proposal will result in more conservative management than what ASMFC requires.
- If management action is being taken to reduce fishing mortality or to rebuild the stock, the Board should determine a minimum additional percentage reduction states must achieve in order to use conservation equivalency to account for the greater inherent uncertainty involved in using state- or Wave-level data.
- States should submit to the Technical Committee a detailed explanation of the derivation of their analysis to support their conservation equivalency proposal. If it involves assumptions about changes to angler behavior, angler effort, etc. that are not readily verifiable via existing annual surveys and data, states must specify a data collection program they intend to implement to conduct a post-hoc analysis of the assumptions following regulatory implementation.

Finally, states that use conservation equivalency must be held accountable when those proposals do not result in the required reductions in fishing mortality. For too long, managers have failed to act when assumptions are not borne out in reality and the conservation equivalency proposal is less than

"equivalent." In these circumstances, the Board must develop a means of real accountability - not one that punishes anglers and commercial fishermen who complied with their state's plan, but one that ensures states are accountable to one another in their cooperative management of this important species.

Recreational Release Mortality

As a primarily recreational fishery, post-release mortality of striped bass is a significant concern. On average, recreational anglers release 90% of striped bass caught annually.[7] Multiplied by thousands of anglers along the East Coast, recreational release mortality can contribute significantly to total coastwide mortality of striped bass. Fortunately, there are easy, commonsense practices that anglers can use to reduce release mortality and positively influence the striped bass population. The Board took a significant step on one of those commonsense strategies through the implementation of mandatory circle hook regulations in Addendum VI. Though quantifying the benefits of this action is difficult and its implementation has not been without challenges, the use of circle hooks is a scientifically supported method to reduce release mortality in the recreational fishery.[8]

Further improvements in recreational release mortality could likely be made through additional changes to striped bass management and targeted angler education. In addition to terminal tackle type, salinity and water/air temperature have been identified as significant factors contributing to recreational release mortality. Low salinity and high-water temperatures (greater than 70 deg F) lead to increased mortality rates. [9] Additional time and area restrictions that limit catch and release fishing in low salinity areas and during warm spring and summer months should be considered to reduce recreational release mortality, particularly in areas where anglers are encountering pre-spawn fish in producer areas. Additional changes to terminal tackle, including the use of barbless hooks or requiring the use of artificial lures in places of natural baits could further reduce recreational release mortality.

In general, many recreational anglers participate in the striped bass fishery for the love of the fish and want to do what is best for the striped bass population. That is why clear, coordinated messaging through targeted angler education programs is critical to addressing the issue of recreational release mortality. Unless anglers know the factors contributing to mortality and how to effectively mitigate them, no amount of regulation will ever be effective at combating this issue.

We believe that it is critical to elevate striped bass angler education to the level of the Commission so that states can leverage each other's efforts and lessons learned to develop a cohesive messaging campaign that is consistent across states. Efforts that engage the tackle industry, retailers, and recreational fishing organizations as critical partners are absolutely necessary.

[7] ASMFC. Atlantic Striped Bass. http://www.asmfc.org/species/atlantic-striped-bass. Accessed 4/1/21.
[8] ASMFC. Addendum IV to Amendment VI to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2014
[9] Tiedemann, J., and Danylchuk, A., 2018. Assessing impacts of catch and release practices on striped bass (*Morone saxitilis*): Implications for conservation and management. https://www.monmouth.edu/uci/documents/2018/10/best-practices-striped-bass-catch-and-release-report.pdf/

We believe the following components of a coordinated angler education program are needed:

- Easy to understand guide to acceptable tackle with photos and/or posters that can be posted at tackle shops.
- Coordination with tackle manufacturers to identify and certify compliant circle hooks.
- Production or promotion of video series on proper fish handling techniques to reduce stress during angling.
- Production or promotion of video series on environmental conditions that affect striped bass mortality with best practices on when to avoid targeting striped bass.
- Development of outreach materials and products listed above in multiple languages to ensure language is not a barrier to education and compliance.

Finally, states must prioritize the enforcement of regulations intended to reduce recreational release mortality. In Maryland, recent widely publicized incidents of non-compliance with Addendum VI regulations were followed by many of the charges being dropped before trial or resulted in nominal fines. This leads to distrust within the angling community amongst those who work hard to be compliant and advertises to those who wish to skirt the rules that enforcement is lax. Regulations must be developed in such a way that natural resources law enforcement officers are able to effectively enforce the rules and make a compelling case should prosecution become necessary.

Management Triggers

Management triggers serve a critical function in the implementation of the striped bass FMP by compelling to Board to take swift action when conditions deviate from the goals and objectives for the fishery. Following the striped bass moratorium in the 1980s, managers and stakeholders alike rededicated efforts to manage striped bass to their biomass and fishing rate target in pursuit of achieving the stock size and characteristics defined in the FMP. Management triggers help mitigate risk by requiring action when the Board receives new information, rather than waiting for irreversible poor outcomes to materialize.

Currently, management triggers 1 and 2 require action when the fishing mortality rate exceeds the threshold in any given year or when spawning stock biomass falls below the threshold in any given year, respectively. These triggers are extremely important and should remain a part of the FMP moving forward. Exceeding the threshold indicates that the stock is considered overfished, is experiencing overfishing, or both. Managers should work quickly to rectify these conditions, which if allowed to continue over time, would undoubtedly lead to population declines.

That the juvenile abundance index trigger has never been tripped yet we have seen several very poor years of recruitment in recent history suggests that adjustments to this trigger may be appropriate. Currently, the trigger is tripped when the recruitment index shows recruitment failure, defined as indices less than the 75th percentile of values, for three consecutive years. Given broad interannual

variability in recruitment, it is not necessarily surprising that this trigger has not been tripped. We suggest considering reducing the number of consecutive years required to trip the trigger from three to two, using a declining trend over three years rather than exceedance of a certain value as the trigger, or reducing the threshold to the 50th percentile.

Additionally, the juvenile abundance index trigger currently does not specify that action must be taken, only that the Board review possible causes of recruitment failure. This is because certain causes of recruitment failure may be outside of managers' control; however, it fails to recognize that certain proactive measures could be taken. For example, if the juvenile abundance index indicates poor recruitment, and the trigger is tripped, managers could develop a long-term plan to reduce fishing mortality at the point in time when those fish are likely to recruit to the fishery to protect that cohort from heavy exploitation as it moves through the fishery. Such a year-class based strategy could also help anglers prepare for restrictions as they will know several years in advance when restrictions are likely to tighten.

Most importantly, management triggers are only effective if they are followed. Recent incidents of the Board failing to act when a management trigger was tripped shows a lack of accountability to the FMP the Board itself created. Regardless of the final management triggers that are ultimately adopted through this process, the Board must remain accountable to those triggers and act accordingly and on the prescribed timelines when tripped. To delay action in spite of a management trigger is unacceptable.

Stock Rebuilding Targets and Schedule

The stock rebuilding schedule should remain as identified in management trigger 4. Striped bass have been lauded as the quintessential fisheries management success story. Part of the reason for this view is that the previous restoration of striped bass began in earnest with the passage of the Atlantic Striped Bass Conservation Act in 1984 and by 1995 the stock was considered fully recovered.

The 10-year rebuilding timeframe would also be consistent with the rebuilding timeframe required for federally managed species under the Magnuson Stevens Fishery Conservation and Management Act.[10] Over 39 different fish stocks have been rebuilt using this standard since 2000 including species in both the Northeast and Mid-Atlantic,[11] two regions that encompass the vast majority of striped bass' geographic range. Taking actions that prolong the recovery of this species will be a disservice to the management history of this species and only hurt the communities that depend on a robust striped bass population.

Regional Management

The Chesapeake Bay region represents one of the best opportunities to undertake a regional management approach for striped bass. The region is home to three different management bodies, the Commonwealth of Virginia, the State of Maryland, and the Potomac River Fisheries Commission and a

[10] MSA § 304(e)(4)(A)(i)-(ii)
[11] National Oceanic and Atmospheric Administration. Success by the Numbers: Rebuilding Fish Stocks. April 12, 2016

harvest control model is already used to set an annual quota for region.[12] Chesapeake Bay harvest tends to be primarily from a smaller class of fish than those harvested in the coastal fishery.[13]

In many ways, the Board has already moved towards a regional management approach for striped bass in the Chesapeake Bay region. During its adoption of Addendum IV, the Board required Chesapeake Bay states/jurisdictions will implement a 20.5% harvest reduction from 2012 levels. This was in addition to a 14% reduction which was adopted in 2013.[14]

If done correctly, regional management could help to reduce the reliance of states on conservation equivalency programs as states in the same regions often adopt similar fishing seasons and bag limits. This could also increase the compliance with season and bag limits as it is common for anglers to fish in multiple jurisdictions in the same region, which currently may have very different regulations.

Recreational Accountability

Striped bass landings along the Atlantic Coast are dominated by the recreational fishery with approximately 90-percent of the total landings coming from this sector.[15] Unfortunately, past efforts to adequately count the impact of recreational anglers have been fraught with problems. As possibly the most popular species along the Atlantic Coast, available to anglers from North Carolina to Maine, developing a recreational harvest monitoring tool is an extremely complex task. Despite the complexities, the benefits of better harvest monitoring tools would benefit both fisheries managers and the fish.

ASMFC, NOAA, and the states should thoroughly investigate opportunities to improve the estimates of recreational harvests. In fact, numerous models such as the Hunter Identification Program could provide models for improving the recreational program which is now based largely on shoreside intercepts of anglers and subsequent random interviews. Increasing the accuracy of recreational catch monitoring tools will be extremely important if ASMFC moves forward with regional management. The sample sizes would be smaller under this approach and ASMFC will want to ensure that any region that is employs such approach is on similar ground to other regions.

Finally, it is imperative that ASMFC work with all stakeholders to improve both the data quality and acceptance of the MRIP program. The National Academy of Sciences Report on MRIP provided many helpful recommendations for improving MRIP that will eventually increase the both the data quality and acceptance of the data collected through the program.

[12] ASMFC. Addendum IV to Amendment VI to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2014
[13] ASMFC. Addendum IV to Amendment VI to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2014
[14] ASMFC Addendum IV to Amendment VI to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2014
[15] ASMFC Public Information Document for Amendment VII to the Interstate Fishery Management Plan for Atlantic Striped Bass. 2020.

Any other issues concerning the management of Atlantic striped bass

In addition to the issues currently considered in the PID, we believe that habitat conservation and restoration, ecosystem-based management, and climate change impacts to striped bass populations must also be included in Amendment VII if the Board is to make any meaningful progress toward the long-term productivity of the coastwide striped bass stock. These issues have long been identified as limiting to striped bass populations and including them explicitly in the interstate fisheries management plan for striped bass ensures these issues will receive the necessary attention and collaborative deliberation that is afforded to other management approaches considered by the Board.

Habitat Conservation and Restoration

Striped bass utilize a number of different habitats throughout their life history, including inlets, riverine spawning habitats, estuarine nursery habitats, and offshore wintering grounds. The degradation of any one of these habitats is likely to have detrimental consequences for the striped bass stock. In 2016, the ASMFC Habitat Committee identified a number of recommendations to improve habitat quality for striped bass, including identifying current and historical habitat distributions for prioritizing habitat protection and restoration. Other approaches focus on water quality, dam passage, environmental contaminants, and prohibition on fishing in spawning in nursery areas. [16]

The primary habitat stressor and priority needs for habitat conservation and restoration are likely different across states. In Chesapeake Bay, for example, nutrient loading that impairs water quality causing hypoxia during summer months is a primary driver of striped bass habitat degradation. Because these stressors vary across states, we urge the Board to include in Amendment VII the requirement for states to develop Habitat Improvement Plans for striped bass, similar to habitat plans developed and submitted to the Commission for shad and river herring. These plans would help states identify, prioritize, and take meaningful steps to address additional impediments to striped bass recovery. Even if the state natural resources agency is not the lead on issues identified in the habitat plan, undertaking this exercise will create key cross-agency connections that will be valuable in addressing habitat issues. Such plans should be reviewed by ASMFC technical staff and/or the Technical Committee and updated periodically, but no less than every 5 years.

Ecosystem-Based Management

In 2020, ASMFC took a significant step in ecosystem-based management through the adoption of ecological reference points for menhaden that are designed to support rebuilding of striped bass to its biomass target when fished at its target fishing mortality rate. This ecological reference point was adopted by the Board as striped bass was shown to be the predator most sensitive to menhaden abundance in the ecosystem model.

[16] ASMFC Habitat Committee. 2016. Striped Bass Life History and Habitat Needs. http://www.asmfc.org/uploads/file/5dfd4b39AtlanticStripedBass.pdf

The "localized depletion" of forage in Chesapeake Bay has been a long-standing concern for CBF and our members. We encourage the Board to consider supporting the development of forage indices and possible management triggers or other management actions that may be considered if the forage base is declining or not sufficient to support striped bass biomass in Chesapeake Bay or coastwide.

Climate Change Impacts to Striped Bass

CBF believes that Amendment VII needs to take a head-on approach to the impacts of climate change on the striped bass population. The Northeast Fish and Shellfish Climate Vulnerability Assessment in which striped bass were given a vulnerability rank of "very high" highlights the need for proactive action. The analysis notes that striped bass' climate exposure was very high based on exposure to high ocean surface temperature, ocean acidification, and high air temperature.[17]

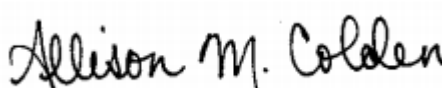
Climate change could lead to critical changes to striped bass productivity. Egg survival in striped bass is inhibited in high water temperatures (greater than 27 degrees C) and egg and larval distribution within the estuarine nursery is a critical determinant of recruitment success. Higher precipitation totals along with more frequent and intense storm events are likely to affect striped bass vital rates, a shift which must be recognized and accounted for in future stock assessments. To ignore these rapidly changing conditions and their impacts on the population risks making management decisions that ultimately undermine striped bass persistence.

Climate change is also expected to induce range shifts in many species, striped bass included. With both stock assessment models and many allocation decisions based on historical data, it is critical that the Board and ASMFC more generally develop a framework that can react to changing species' distribution and availability as ranges shift.

Thank you for your consideration of these comments on the PID for Amendment VII to the striped bass FMP. CBF hopes that these comments are helpful in the final adoption of Amendment VII, which we hope will reverse the trajectory of striped bass decline and start to rebuild this iconic species.

Sincerely,





Chris Moore
Senior Regional Ecosystem Scientist

Allison M. Colden, Ph.D.
Maryland Fisheries Scientist

cc: Alison Prost, Vice President, Environmental Protection & Restoration, CBF
Peggy Sanner, Virginia Executive Director, CBF
Josh Kurtz, Maryland Executive Director, CBF

[17] Hare JA, Morrison WE, Nelson MW, Stachura MM, Teeters EJ, Griffis RB, et al. (2016) A Vulnerability Assessment of Fish and Invertebrates to Climate Change on the Northeast U.S. Continental Shelf. PLoS ONE 11(2): e0146756. https://doi.org/10.1371/journal.pone.0146756

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Ellen Goethel
Melissa Paly

Coastal Conservation Association Of New Hampshire
Post Office Box 4372 • Portsmouth, NH 03802
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April 9th, 2021

*Via Electronic Mail (*comments@asmfc.org)

Re: Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,

The Coastal Conservation Association of New Hampshire is a non-profit conservation organization comprised of marine recreational enthusiast, fisherman, and concerned citizens. The stated purpose of CCA NH is to advise and educate the public on conservation of marine resources. The objective of CCA NH is to conserve, promote and enhance the present and future availability of these coastal resources for the benefit and enjoyment of the general public.

Striped Bass are a very important species to the members of our organization and our local economy as well. Our region has seen a major decline in size and diversity of year classes. Our hope is that the species will be managed for abundance in the years ahead, for our generation and future generations.

Please find our comments on the Striped Bass PID below.

Sincerely

Zakary Robinson

Zakary Robinson, President CCA NH

DEDICATED TO CONSERVING NEW HAMPSHIRE'S MARINE RESOURCES

The Coastal Conservation Association of NH ("CCA NH") is an unincorporated state chapter of the Coastal Conservation Association ("CCA"), which has over 96,000 members in seventeen states. CCA is a nonprofit, public charity corporation that is qualified under IRC §501(c)(3).
Donations to CCA NH are tax deductible under IRC §170.

Striped Bass PID Comment

1. **Fishery Goals and Objectives**
   Status Quo

2. **Biological Reference Points**
   Status Quo

3. **Management Triggers**
   Status Quo

4. **Stock Rebuilding Targets and Schedule**
   Status Quo

5. **Regional Management**
   Status Quo

6. **Management Program Equivalency (Conservation Equivalency)**
   CE should not be utilized any time the stock is overfished or if overfishing is occurring. States utilizing CE should be held accountable if overfishing occurs due to CE.

7. **Recreational Release Mortality**
   Efforts should be focused on education and outreach to promote best practices.

8. **Recreational Accountability**
   Recreational accountability should be implemented for states utilizing CE.

9. **Coastal Commercial Allocation**
   Status Quo

DEDICATED TO CONSERVING NEW HAMPSHIRE'S MARINE RESOURCES

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From: Robert Newberry
Sent: Friday, April 9, 2021 11:50 AM
To: Comments
Subject: [External] COMMENTS ON AMENDMENT 7 FOR STRIPED BASS

After reviewing Amendment 7, we at Delmarva Fisheries Association have come to the conclusion that the major problem with the coastal population of striped bass falls into one specific category. This category is, that the recreational Fishery, which is responsible for the issues concerning Amendment 7, has greatly failed to adopt any form of an accountability standard in their Fishery. Specifically in Maryland, we have 2 participants in the Striped Bass Fishery. One being commercial , and the other being recreational, which by the way includes our For Hire participants. Over the past several years, our commercial Fishery has been held at over 95%+ accountability through tagging an electronic reporting. The for-hire Fishery, which is linked together with a recreational Fishery, as of last year has had electronic reporting as a form of accountability and conservation equivalence. The remainder of those people in the recreational Fishery that are not for hire have failed greatly in their efforts to move forward with any form of accountability. For many years and in many meetings Delmarva Fisheries Association has heard some of these people that represent the recreational Fisheries participants promise to create or Implement some form of accountability. As of today date, they still have no viable form of accountability. Maryland Fisheries managers have led the way over the past several years at being out front on the issues to create better forms of accountability for our Fisheries by working with those in the commercial and for hire sector. We are not saying that they have not worked with those in the recreational sector, but those participants have not seen to step up to the plate and address the proper method for accountability of what they catch in the Striped Bass Fishery. We understand that Amendment 7 is needed, but we at Delmarva Fisheries Association would ask the commission too seriously look into a form of accountability that uses up-to-date technology that can be used by participants in the recreational Fishery that would create the accountability parameters that are needed. Striped bass are not only a very important economic and environmental Factor in Maryland, and also along the coast, but just happens to be our state fish for the great state of Maryland. The abundance of the striped bass in the Chesapeake Bay is very important to all of us in the state of Maryland that not only make a living on it, but also enjoy the recreation that is created by participating in The Fishery. For without this Fishery, the economic downfall would be catastrophic.

In summary, Delmarva Fisheries Association and its members do agree with some of the factors in Amendment 7, but the most important issue is developing a scientifically-based accountability for the recreational Fishery. Specifically in the waters of the Chesapeake Bay of Maryland, the commercial, and the for-hire Fishery have stepped up to the plate and worked with our Department of Natural Resources with great results to develope our accountability. It is now the time for those remaining in the recreational Fishery to follow in our footsteps and do the same.

Respectfully,
Captain Robert Newberry
Chairman

Delmarva Fisheries Association Inc
Chestertown Maryland

From: Brent Hunsinger
Sent: Tuesday, April 6, 2021 3:44 PM
To: Comments
Cc: STEVEN G. BOWMAN; Patrick Geer; MARTIN GARY; Monty Mason; Bryan Plumlee
Subject: [External] Comments on Amendment 7 to the Striped Bass Fisheries Plan

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Dear Ms. Franke and Virginia members of the Striped Bass Board,

On behalf of Friends of the Rappahannock (FOR) I thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

FOR's mission is to be the voice and active force for a healthy and scenic Rappahannock River. We are pleased to offer the following comments to the Amendment 7 PID.

1. Goal and Objectives

The current goal and objectives for the fishery are sufficient and we recommend they remain the same as in Amendment 6. Striped bass should be managed for increased abundance and age structure. This requires regulatory consistency and stable management of the fishery.

2. Biological Reference Points

We believe 1995 is an appropriate reference year and we recommend that the BRPs remain unchanged. ASMFC should focus on managing fishing mortality to rebuild the stock and avoid future declines in the striped bass population.

3. Management Triggers

The four management triggers related to spawning stock biomass and fishing mortality remain appropriate. Trigger 5, regarding recruitment failure should be changed and strengthened by considering the young of the year index as nature changes from year to year.

4. Stock Rebuilding Target and Schedule

The 10-year stock rebuilding timeline specified in Amendment 6 should be maintained.

5. Regional Management

The current model of regional management should be maintained for the Chesapeake Bay and Ocean Regions for the time being. The stock specific science does not yet exist to support regional management for Hudson and Delaware Bay regions. It is important to .

continue the development of a multi-stock model to improve understanding of stock dynamics.

6. Conservation Equivalency

Conservation Equivalency (CE) should only be considered if striped bass populations are neither overfished nor experiencing overfishing. States that use CE measures that do not deliver the desired results must be held accountable and corrective action should be required.

7. Recreational Release Mortality

Catch and release mortality is too high. Mortality must be lowered and this should be a high priority. Striped bass mortality rates must be addressed but
with current research ongoing this issue should be handled as a following action. This does not preclude a continued focus on outreach and education to anglers in order to promote best practices for safe release
When ASMFC does address catch and release mortality all options must be looked at including seasonal closures, additional gear restrictions, and increased angler education opportunities in order to reduce release mortality in the recreational fishery.

8. Recreational Accountability

This is a very complex issue that is too large in scope to be dealt with in this action. Recreational Accountability should be handled in a subsequent action or addendum.

9. Commercial Allocation

The landings period used as a baseline for Commercial quotas is no longer appropriate as it is 50 years old. The Striped Bass Board should work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

10. Other Issues

The impacts of climate change should be taken into account when making management decisions for striped bass populations. Climate change poses a significant threat to striped bass recovery. These impacts contribute to recruitment success and failure and having more knowledge will lead to a broader understanding of stock changes driven by climate change.

Thank you for your consideration of these comments.

Respectfully submitted,

Brent Hunsinger, Friends of the Rappahannock

--
Brent Hunsinger

Rappahannock River Steward- Spotsylvania, King George, and Caroline Counties
State Policy Coordinator
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****
Are you a FRIEND of the Rappahannock? We are a membership driven organization. Join today and help us be the daily voice and active force for the River and its tributaries



April 8, 2021

Ms. Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke,

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass. Please forward these comments to the ASMFC Atlantic striped bass Management Board.

Summary:
Fourteen years ago, ASMFC's own assessment data showed Atlantic striped bass were in decline. Eight years ago, assessments showed the biomass was below target and at threshold. Two years ago assessments showed the biomass was well below threshold and still falling. Existing regulations required the ASMFC to initiate a rebuilding plan at any one of these inflection points.

Yet in all these years despite having clear data, straightforward regulatory guidelines, and a mandate to rebuild the Board has taken no actions that have turned the curve upward. And now the Board is two years into a multi-year process to develop a new framework in 'how' to respond.

The time is long past for parliamentarian discussions and regulatory rewrites. Now is the time for real reductions to harvests to turn the decline curve around. Time for substantive, conservative approaches that (at the very least) meet a one-sigma probability of success.

The only variable that can be adjusted in a timely manner is reducing the rate of harvest – reducing total removals by both recreational and commercial fishing. Mortality must be cut significantly, and immediately, across all sectors to allow rebuilding to begin. This is likely to require recreational seasonal closures, catch limits, and quota reductions for commercial sectors.

Our comments on the specific issues related in the PID are listed in order, below.

Item 1. Goals and Objectives.
The goals and objectives as written in the existing Atlantic striped Bass Fishery Management Plan require no updating to proceed and should be acted on now. Please eliminate this issue from any further consideration.

Item 2. Biological reference points.
The existing 1995 reference points are entirely sufficient. Changing the reference points would move the goal posts closer and lower the bar. Please eliminate this issue from any further consideration.

Item 3. Management triggers.
The first four triggers are entirely suitable. The Technical committee should act on these now. The fifth trigger (relating to recruitment metrics) should be reworded to address the inherent variability of recruitment.

Item 4. Rebuilding targets and schedules.
The existing Amendment 6 requires a 10-year plan. This should be implemented immediately and maintained going forward. Please eliminate this issue from any further consideration.

Item 5. Regional management.
70-90% of all striped bass are spawned and return to breed in the Chesapeake Bay, and the remainder are spawned in the Delaware, Hudson, and other rivers. Resist the temptation to parse the shrinking migratory stock into 'ours' and 'theirs' and begin better management of the migratory biomass as a whole. Regardless of these facts, until such time as there is solid, tested science with ongoing yearly monitoring programs to reliably inform management processes, this concept should be removed from discussion.

Item 6. Conservation equivalency.
Without in-depth and ongoing/yearly assessments to quantify and measure results, CE plan results cannot be monitored effectively. Without metrics there is no accountability, and absent yearly science-based metrics for an ecosystem under management, CE should be abolished.

Item 7. Recreational release mortality.
Reducing recreational effort is exactly opposite to the facts of this multi-billion-dollar recreational fishery. As more than 90% of the fishery is catch and release, management should maximize opportunity by focusing on abundance. As it happens, Massachusetts is conducting a mortality survey that will serve the ocean states. However, considerable science shows rec release mortality increases remarkably in warm, low-oxygen conditions. The northern Chesapeake (the source for at least half of the bass population) is above 80deg from mid-June to early-September with low oxygen and poor forage, yet current science on mortality rates in this ecosystem is sparse. In order to develop factual basis for any management decisions, the ASMFC should direct Maryland to conduct a companion study to the Massachusetts program. Until such time as this study is completed, Maryland should close the inland fishery entirely when the avg. Chesapeake Bay water temperature is above 80deg.

Item 8. Recreational accountability.

There are ample mechanisms to obtain statistically-valid assessments of recreational performance – new technical tools, surveys improvements, and volunteer/incentivized reporting can all be implemented, if the management board so chooses. The Board should choose to act now and promulgate regulations that require states to collect better, more frequent data. Absent improved methodologies to reliably obtain metrics on recreational take, the Board should remove non-scientific approaches from discussion.

Item 9. Commercial allocation.

Recommend a science-driven examination of the reference points and require a tighter coupling of actions across all sectors to ensure compliance measures are shared equitably.

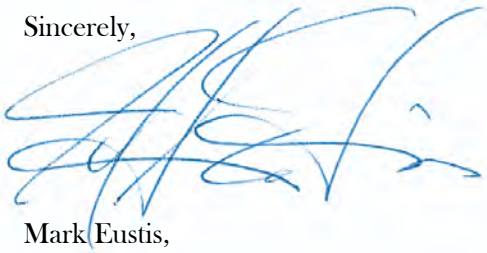
Item 10. Other –

Any studies looking at human dimensions and economic impact should focus on providing fair warning – those who base their livelihood on a highly changeable natural resource are subject to regulatory changes that may adversely affect their business when science dictates. Seeking to modify regulations to mollify a noisome minority at the expense of long-term abundance in the fishery is not only bad policy, it's bad business.

Conclusion:

We are at an inflection point in the management of striped bass. Management must act in a timely, effective, and science-driven manner to rebuild the stock. The regulatory requirements and standards have been on the books for years – time to use them.

Sincerely,



Mark Eustis,
Managing Director.

HI-MAR STRIPER CLUB INC.

P.O. BOX 126 • MIDDLETOWN, NJ 07748

April 8, 2021

Ms. Emilie Frank
Fishery Management Plan Coordinator
1050 N. Highland St, Suite 200A-N
Arlington, VA 22201
Email: comments @asmfc.org

Reference: New Jersey Public Hearing on Atlantic Striped Bass Draft Amendment 7, Striped Bass PID

Dear Ms. Frank:

Hi-Mar Striper Club of Middletown, New Jersey, and its 45 members welcome the opportunity to present the following comments regarding Atlantic Striped Bass Draft Amendment 7 to the Atlantic States Marine Fisheries Council:

- First and foremost, the Hi-Mar Striper Club is in favor of maintaining the current regulations for Striped Bass in New Jersey. These regulations have only been in place for a relatively short time and we feel more time is need to determine if they are having a positive effect as intended on improving Striped Bass stocks.
- Hi-Mar Striper Club is **opposed** to a moratorium on the harvesting of Striped Bass. We endorse measures that will provide for a sustainable fishery. Catch and Release fishing for Striped Bass may appear to be a means of conserving the stock, however mortality from catch and release fishing may account for 45 -50% of all recreational mortality, due to various factors such as water temperature, salinity, stress on the fish due to prolonged fight, or just poor handling of fish intended to be released.
- Hi-Mar Striper Club endorses the use of Circle Hooks to help decrease the rate of mortality of fish that are released. Information should be gathered to determine if this does indeed produce the positive results it is believed it will by lowering the possibility of "gut-hooked" fish.

- Hi-Mar Striper Club is in favor of allowing each state to manage their Striped Bass Fisheries, as they see fit, based upon actual data and knowledge of local fisheries. Proper funding for creating, monitoring and amending management plans to address any changes must also be provided by each state. Collection of real, accurate data, recording of this data, and analysis of this data, in a timely manner must be made a priority to determine if the management plans are working, or if adjustment needs to be made. Although probably wishful thinking, states with adjoining coastal waters should try to develop similar regulations for size and bag limits and open seasons.
- Hi-Mar Striper Club is in favor of continuing the use of Conservation Equivalency to determine Striped Bass size and bag limits and fishing seasons to provide a sustainable fishery within the allowable coast wide parameters. Conservation Equivalency was developed by fisheries management professionals and has a demonstrated history of effectiveness in providing a sustainable fishery and, also achieving the conservation goals.
- Hi-Mar Striper Club also realizes that enforcement of fisheries regulations is an important part of fisheries management. Proper funding for enforcement of regulations to ensure compliance is as important as the development and administration of the actual management plans.
- Hi-Mar Striper Club endorses the continuation of New Jersey's Striped Bass Bonus Program. This is an optional program that anglers must apply to. Participation in the program requires that all striped bass fishing trips and results be logged and reported, not just trips where a bonus fish is harvested. These logs must be transmitted to New Jersey Division of Fish & Wildlife and become an excellent source of data for fisheries management. The Striped Bass Bonus program uses the allocation that would otherwise go commercial Striped Bass fishing, if it were permitted in New Jersey, or to the commercial Striped Bass quota in another state, where it would be quickly used up with no beneficial collection of data.
- Hi-Mar Striper Club **does not recommend** opening of the EEZ to fishing for Striped Bass. The closure of the EEZ was primarily intended to prevent the wholesale destruction by commercial fisheries, during certain times of the year, in certain places. Opening of the EEZ to fishing, particularly commercial fishing would un-do years of Striped Bass conservation efforts.

We are also responding in the context of the specific questions that were asked in the PID document. These are presented below:

Comments Regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

1. Fishery Goals and Objectives
   In addition to the currently stated Goal and Objectives of Amendment 6, we encourage steps to Increase the perceived accuracy of data metrics through the implementation and use of new technology tools through partnerships with commercial and recreational stakeholders. The objective being to reduce the perception that "the data is flawed" and therefore the emotion that the management Plan is either too restrictive or not restrictive enough to meet the stated Goal.
2. Biological Reference Points
   a) Leave 1995 in place as the benchmark reference year for determining stock status.
   b) Continue to use 25% as the buffer
   c) There should be separate models for the ocean and Chesapeake fisheries
   d) Based on todays slot requirements, manage the stock for diverse age structures that would allow a trophy bass to be caught and released and a smaller better tasting fish to be kept for consumption.
3. Management Triggers
   any of the mortality triggers that require adjustment to the striped bass management program to produce measurable changes within 1 year (F> target, F> target 2 years and SSB < target) should be changed to require F < target within 3 years. It takes almost that long to see the effect of any change.
4. Stock Rebuilding Target and Schedule
   We prefer smaller incremental changes over time to gradually rebuild the stock. It provides a better foundation against annual fluctuations in mortality and recruitment. A fine tune approach versus a sledge hammer.
5. Regional Management
   Simple is better. Return to Ocean and Chesapeake regional split as defined prior to Amendment 6 addendum IV until the competing two-stock model SCAA model is deemed ready roll out. Use MRIP data to allocate fishing mortality scores between the two regions.
6. Conservation Equivalency
   CE should continue to be part of the Striped Bass FMP. However, Equivalency should be clearly defined. Better MRIP data accuracy though use of a smartphone app common to all ASMFC jurisdictions would help determine CE effectiveness.
7. Recreational Release Mortality
   If the mortality rates remain high then mortality mitigation, through the use of further gear restrictions, should be studied to determine effectiveness of specific changes. Angler education of proper handling and return techniques using YouTube and tackle shop poster campaigns would also contribute to lowering the mortality for both catch and release and outside slot returns.
8. Recreational Accountability
   RHL's should not be implemented. RHL's do not work as seen with Fluke and Black Sea Bass. More accurate and timely MRIP data from the States would provide better insight into accountability. Development of a smart phone app to allow anglers to input metrics at time of catch including size and condition of release would provide higher MRIP input compliance and therefore higher accuracy confidence.

Comments Regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

9. Coastal Commercial Quota Allocation
   Amendment 7 should address commercial allocation. However, at the very least, the baseline year should be moved from the very old, and likely inaccurate, 1972-1979 average landings figure to 1995 to match the recreational base line and set on a 2 year schedule.

The Hi-Mar Striper Club respectfully submits these comments; We trust they will be considered in the formulation of Amendment 7 to the Striped Bass Management Plan,

Very truly, yours

Hi-Mar Striper Club

Stephen M. Machalaba, Vice President

Cc: JCAA

Long Island Commercial Fishing Association
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Sustainable Fisheries *and* Fishermen for the 21st Century

April 9, 2021

Emilie Franke

Striped Bass Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Dear Emilie:

Please accept these comments on behalf of the Long Island Commercial Fishing Association, representing commercial fishermen from assorted gear types across Long Island.

With regard to the Public Information Document for Amendment Seven to the Interstate Fishery Management plan for Atlantic Striped Bass, we would like to submit the following comments for consideration.

We believe that management stability and flexibility, as it pertains to commercial fishermen, are goals of great importance in relation to commercial catch.

Management stability in our view pertains to maintaining a commercial season without closures. Flexibility means utilizing management tools to provide for optimum yield while at the same time protecting the stock so that we can catch fish far into the future. We believe that commercial fishermen have done so, and our harvest and discard mortality has shown for over 30 years, we are acting as good stewards of the resource.

In that vein, management flexibility might be innovative methods method by which states that do not fully utilize their commercial quota could be able to transfer that quota to states who could, similarly as was done in years past in the Bluefish fishery between states like Florida and New York. Commercial allocation transfer would be particularly helpful to achieve OY for those states that, through game fish status or lack of inshore fishery, would be unable to utilize their quota.

We believe in relation to Issue Four, there must be a balance between rebuilding stocks as soon as practicable, and not threatening a sector of the fishery with closure. Because the majority of discard mortality is from the recreational fishery, we would not like to see closures of our commercial fishery due to recreational overages.

Commercial fishermen are held to a myriad of regulations and requirements for their portion of the Striped Bass fishery. Accountability measures including pound for pound pay backs if they go over at the State level. Their good stewardship of their portion of the resource should not suffer because of a multitude of recreational variabilities.

The ability of commercial fishermen to provide consumers with a high quality wild-caught protein source should not be forgotten in this amendment. Especially in light of this past year and Covid related food shortages, commercial fishermen's wild-harvest should be highlighted, not further buried, in the goals of this amendment.

Thank you

Bonnie Brady
LICFA

Thank you for the opportunity to provide feedback on the Public Information Document published by the ASMFC Striped Bass Board as it initiates Amendment 7 to the Atlantic Striped Bass Fishery Management Plan. Please add the following comments to the official record on behalf of the Maine Association of Charterboat Captains.

As Charterboat captains we need both abundance and broad age diversity to sustain and grow our businesses. Large numbers of catchable fish drives a significant percentage of our business. More fish of significant size would help us grow our business. Our current dependence on only a few year classes of fish makes our endeavors inherently unstable.

The most pressing need in this fishery is for a stock rebuilding plan that meets the commission's own 10 year timeframe requirement set in Amendment 6. This must be included in Amendment 7.

1. Goals and Objectives

We don't need new goals – we need to meet the goals we have. Goals and objectives set in 2003 with Amendment 6 are sound and achievable. The striped bass board has failed to meet those goals as evidenced by the fact that striped bass are overfished and that overfishing is occurring.

2. Biological Reference Points

1995 should continue to provide the reference points for this fishery. The push to change the biological reference points by some states is the most alarming proposal in the PID and we need Maine's board members to hold the line on this issue. Lowering the goals to allow continued unsustainable harvest should be a non-starter. The board's decision on biological reference points will have significant impact on this fishery for the next 10 to 20 years.

The 1995 reference points were selected for good reason. The stock was declared recovered. There was a broad age structure and an abundance of fish. Anglers all along the East Coast had

rediscovered the joy of fishing for striped bass. If you fished in Maine in 1995, you know how good it can and should be. Those who want to lower the reference points by using another year claim that the targets are not achievable. I've not seen any research to support their claim and expect that our board members would challenge any such assertion.

3. Management Triggers

Management triggers are the only mechanism that causes the board to act. They must not be weakened. If the board chooses to have more consistency in timelines for action, it can't be at the cost of conservation.

Given all of the uncertainty in data collection, stock assessments, changing ocean conditions due to climate change, angler behavior, and other factors inherent in any fishery risk mitigation deserves greater attention. The board should build in greater margin for error when setting targets for reducing mortality, erring on the side of conservation.

The board should prioritize revising the target tied to recruitment failure. There is opportunity and need here for a fundamental change in the way the board operates. Management decisions are currently driven by past events and take a long time to implement. We must make better use of the forecasting provided by the juvenile abundant index. The way to avoid "knee-jerk" reaction in management measures is to plan ahead and that isn't happening.

4. Stock Rebuilding Targets and Schedule

The most pressing need in this fishery is for a stock rebuilding plan that meets the commission's own 10 year timeframe requirement set in Amendment 6. This must be included in Amendment 7.

5. Regional Management

The best available science does not support a two-stock model. **I have faith that the board will reject attempts to implement any two-stock model but I am gravely concerned about a return to the failed approach of regional management.**

The fishery in every state from New Jersey to Maine is influenced significantly by management decisions in Chesapeake Bay and the Delaware watershed. Maryland and Delaware have consistently demonstrated a willingness to make unsustainable and irresponsible harvest a priority and almost every other state has paid a substantial price. If either of these states or the board made appropriate decisions on managing the 2011 year class, our fishery would be in a very different place right now. We can't afford to revisit regional management at this time. We need to continue with consistent regulations coastwide.

6. Conservation Equivalency

Amendment 7 should suspend the use of Conservation Equivalency until two conditions are met - one, striped bass are no longer overfished and overfishing is not occurring, - and two, there are appropriate measures in place to require accountability should Conservation Equivalencies prove not to be equivalent. Currently there is an absence of accountability and Maine deserves credit for pushing for such measures at the 2020 winter board meeting. My only concern about this approach is the limits it may place on states that want to implement regulations expressly designed to be more conservative than those mandated by the board.

7. Recreational Release Mortality

What matters is total mortality. Reducing overall mortality **is** achievable with bag and size limit adjustments - if the board has the will to do so. Don't allow recreational release mortality to become a "red herring". Research underway by Massachusetts DMF is an important step in better estimation of removals via release mortality. Angler education around this subject is worthy of additional funding.

8. Recreational Accountability

A hard quota for the recreational fishery would be good for a board prone to inaction but isn't the right solution at this time. Recreational Harvest Limits have significant appeal in the abstract but given current results and challenges in the fluke and black sea bass fisheries managed under RHL's we don't yet have the data needed to make this change.

9. Coastal Commercial Allocation

This is not a critical issue for inclusion in Amendment 7.

10. Other Issues

Expand research on regionally specific post-release mortality – building on current work underway in Massachusetts.

Develop a better understanding of the relative contributions of individual spawning stocks to the overall coastal population.

Continue to devote significant resources to improving MRIP data and the stock assessment model.

Predict long-term impacts of climate change on the fishery, especially on potential changes to spawning success in historically significant producer areas.

In conclusion, two themes run throughout the PID – management stability and flexibility:

Stability is easily achieved with a fully rebuilt fishery.

Management flexibility without accountability is irresponsible. The track record for flexibility in management decisions is abysmal.

It's stunning that Management Accountability is not a prominent theme in this document. The board has the opportunity to correct that omission when it crafts the draft Amendment in May.

The ASMFC Striped Bass Board members need to rebuild this fishery and to craft an Amendment that prevents us from returning to our current predicament.

Thank you,

Capt. Peter Fallon, President
Maine Association of Charterboat Captains

207-522-9900
pfallon@mainestripers.com

Maine Professional Guides Association

55 Morrison Hill Road
Wilton, ME 04294

www.maineguides.org

My name is Don Kleiner, I live in Union, Maine and am the Executive Director of the Maine Professional Guides Association. The association represents roughly 1000 licensed guides throughout the state. Collectively our members offer almost any sort of guided outdoor experience you can imagine. We are proud of our quality outdoor experiences and our role in helping the states conservation efforts become an economic benefit for the primarily rural communities where we live.

My first memories of striper fishing are of spending nights after finishing my homework fishing under a bridge. A young boy of maybe 12. With a kerosene lantern I was given to use for light and a little warmth. That lantern has a place of honor on the hearth today the enamel long since rusted off. My parents drove me to the bridge crossing and allowed me to endure the cold west wind for a couple of hours after supper trying for a striper. I also remember spending whole days there during spring school vacation.

My next memory is of catching stripers in nets for sale. I would have been in college at the time working as a clamdigger to pay my way through college. In fact, we netted two of the largest stripers I have ever seen in those years. The roe from one of them we took home and ate, it was larger than many of the fish my clients catch today. After coming to Maine, I first guided for stripers in the Sheepscot River out of Wiscasset in the late 1980s and early 90s. At the time I believed that there were no stripers further to the east. Eventually I tried my home river and discovered 2 things; first that there are stripers and second that there were very few other anglers.

Those first years of my guiding career were the good old days; numbers of fish and enough truly big fish to make every trip interesting. When I started guiding for them my grandfather told me to be cautious about building a business on the striper population. I can still hear him saying “they have come and gone twice in my life” to which I responded with the confidence of youth. That won’t happen grandpa we manage things today. Lucky for me he passed before the recent population crashes but he was right and it has happened to me twice now too. We have enjoyed decent fishing for the last few years but the truly big fish are distant memory on this part of the Maine coast.

In the interim I have been fortunate to have a business based on chasing them. That business provided for me and my family even allowing for us to help my sons both attend college. For the future what we want and need is a constant population of fish that provide for a basis to build a stable business. The wild swings are at some level natural but it seems to me that they have been made wider by management failures.

While we appreciate having the chance to comment on tactics we feel that setting the goal is the critical piece and that tool selection be left to the folks we have hired to do the work. Simply put the most

pressing need in this fishery is for a stock rebuilding plan that meets the commission's own 10 year timeframe requirement set in Amendment 6. This must be included in Amendment 7.

Goals and objectives set in 2003 with Amendment 6 are sound and achievable. The current striped bass management has failed to meet those goals as evidenced by the fact that stripers are overfished and that overfishing is occurring. We don't need new goals – we need to meet the goals we have.

The fishery in every state from New Jersey to Maine is influenced significantly by management decisions in Chesapeake Bay and the Delaware watershed. We cannot afford to revisit regional management. We need to continue consistent regulations coastwide. Management flexibility without accountability is simply irresponsible. We are surprised that accountability is not prominent in this document. The board has the opportunity to correct that omission when it crafts the draft Amendment.

Maine's striped bass board members need to continue to lead the effort to rebuild this fishery and to craft an Amendment that prevents us from returning to our current predicament ever again. Because somewhere on the east coast is a 12 year old under a bridge fishing for stripers and we owe them at least as good an opportunity as I have had over the last 50 years and hopefully better.

Thank you very much for taking our collective opinions into account as you move forward.

Don Kleiner
Executive Director
Maine Professional Guides Association
55 Morrison Hill Road
Wilton, ME
dkleiner@maineguides.org

Massachusetts
Striped Bass Association

Since 1950

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

April 9, 2021

Dear Emilie Franke,

After monitoring the ASMFC PID hearings and hosting an open to all members process to develop the following comments: I am submitting this public comment letter on behalf of the hundreds of recreational fishing families, for hire operators and commercial harvesters that make up the membership of the Massachusetts Striped Bass Association.

Our membership as a whole is very concerned with what our eyes and fishing rods tell us is a striped bass fishery in serious decline and in our expert opinion, teetering on the verge of collapse. We offer the following comments in direct response to the information provided and questions asked in the Amendment 7 Public Information Document and urge ASMFC to move quickly and avoid delay in developing Amendment 7 within the published timeline.

1. Fishery Goals & Objectives:

MSBA supports the current "goal" for the fishery as written. We feel the current language is short, to the point and describes the exact fishery our membership wants to experience.

MSBA supports the majority of the existing "objectives" as written and urges status quo except for the following.

It is our opinion that as fishing effort increased and recruitment declined over the past 10 plus years, the following "objective", allowed for delays in management response and a variety of alternative state by state management actions. These actions when combined added too much flexibility, increasing mortality and management uncertainty to the point no individual action could be effective or adequately evaluated. Instead of managing a sustainable striped bass fishery, ASMFC inadvertently allowed overfishing as stock recruitment declined. This must change.

We suggest the following edit in order to close the loopholes in this objective that we feel allow for delays in management response and increase management uncertainty.

Current language: "Provide a management plan that strives, to the extent practicable, to maintain coastwide consistency of implemented measures; while allowing the states defined flexibility to implement alternative strategies that accomplish the objectives of the FMP"

Suggested Edit: "Provide a management plan that using the best available science; maintains coastwide consistency of implemented measures that accomplish the objectives of the FMP"

We further suggest that during the Amendment 7 process, ASMFC develop an additional "objective" to rebuild the fishery, to the extent practicable, to the levels seen in the early 2000's.

2. Biological Reference Points :
MSBA supports continued use of Biological Reference Points as outlined in the current FMP. We acknowledge best available science indicates that it is unlikely the SSB will reach 1995 levels, however we continue to believe striped bass management should in theory aim toward building back to the previous height of the fishery in the early 2000's. Our membership is opposed to adjusting BRP's in order to allow increased mortality in the fishery. **It is for this reason MSBA supports status quo Biological Reference Points and recommends this subject be removed from consideration in Amendment 7.**

3. Management Triggers
MSBA supports the continued use of management triggers as described in the current FMP. We acknowledge best available science indicates that it is unlikely the SSB will reach 1995 levels, however we continue to believe striped bass management should in theory aim toward building back to the previous height of the fishery in the early 2000's. There is overwhelming agreement amongst our membership that ASMFC has allowed far too many exceptions/loopholes to this section of the current FMP and that Amendment 7 should remove regulatory language that has allowed these exceptions/loopholes. **It is for this reason MSBA supports status quo on the subject of Management Triggers and recommends this subject be removed from consideration in Amendment 7.**

4. Stock Rebuilding Targets & Schedule
MSBA supports the continued use of Stock Rebuilding Targets & Schedules for response as described in the current FMP. We acknowledge best available science indicates that it is unlikely the SSB will reach 1995 levels, however we continue to believe striped bass management should in theory aim toward building back to the previous height of the fishery in the early 2000's. There is overwhelming agreement amongst our membership that ASMFC has allowed far too many exceptions/loopholes to this section of the current FMP and that Amendment 7 should remove regulatory language that has allowed the exceptions/loopholes. **It is for this reason MSBA supports status quo on the subject of Stock Rebuilding Targets & Schedules and recommends this subject be removed from consideration in Amendment 7.**

5. Regional Management
Regional Management is a term through which a wide variety of management approaches may be driven.

MSBA is opposed to regional management strategies that allow for separate coastal regions that use different measures such as "f-rates", regional allocations within the recreational fishery and other tools experienced in FMPs such as black sea bass and summer flounder.

MSBA supports continued regional management of Atlantic Striped Bass under two separate geographical designations. Those designations are (1) a single coastal migratory management area and (2) a second designation for the Chesapeake Bay fishery.

In addition to these positions, our comments under the Recreational Release Mortality (Issue 7) of this PID include a request for ASMFC to develop draft effort control measures including the use of open and closed seasons. We anticipate development of this measure to require option(s) with a regional management component.

6. Management Program Equivilency (Conservation Equivilency)
We feel allowance of conservation equivalency is the largest contributing reason (under ASMFC control) for failure of recent management actions to effectively prevent overfishing of striped bass.

The MSBA membership and to the best of our knowledge the overwhelming majority of recreational and commercial anglers in Massachusetts are unconditionally opposed to allowing

management program equivalency or conservation equivalency of any type in the Atlantic Striped Bass FMP.

7. Recreational Release Mortality

There is no question that recreational release mortality is the largest contributing factor to striped bass mortality under ASMFC control…and this fact will never change. Although there are many reasons that inspire an angler to fish for striped bass, the fact that they are delicious notwithstanding, the vast majority of those who fish for striped bass release well over 90% of the fish they catch. To think this will ever change is unrealistic.

MSBA supports use of the 9% recreational release mortality calculation as the best available science at this time. Although we feel further research on this subject has value, we question whether updated science and improved angler behavior that could result in a slight adjustment to 7, 6 or even 5% release mortality would have any real effect on the issues facing management today? Our answer to this question is that incremental changes to the recreational release mortality rate would not likely provide anywhere close to enough conservation benefit to change the question facing mangers today. How should ASMFC reduce recreational release mortality in a way that supports rebuilding the striped bass fishery?

The PID asks for specific comments on further regulations in the area of gear type. The variety of tackle used in striped bass fishing are endless. Although we support a continued push for research and education with a focus on lowering the 9%, we must question if regulations that prohibit or limit specific gear types are able to actually reduce recreational release mortality in a significant way. Locations up and down the coast have varied versions of common gear types and local gear types that in some cases are limited not to specific states, but to a specific port. Small local tackle manufacturers tied to the striped bass fishery number in the hundreds if not thousands. To single out and analyze release mortality tied to specific gear types would be an endless task that is more likely to cause even more uncertainty in statistical models that were never designed for this type of small-scale analysis in a massive fishery model. Trying to analyze release mortality of treble hooks on artificial lures, the number of rods trolled, additional stress caused by the use of wire lines or release mortality related to use of fly rods are just the very tip of the gear type iceberg that was brought up as our membership discussed this subject. Our conclusion is that any further regulations regarding gear types would disproportionally affect various subsets of the fishery and cause an unfair burden be carried by small groups of consumers, distributors and manufacturers while other gear types that may have similar effect on mortality may avoid being a part of the solution entirely.

After careful consideration and much discussion, MSBA suggests further regulations aimed at limiting gear types are not an appropriate tool that should be considered in Amendment 7 to reduce recreational release mortality.

There is an unavoidable reality our membership believes management must realize when it comes to the question of how to reduce recreational fishing mortality.

THE ONLY WAY TO KILL FEWER FISH IS TO CATCH FEWER FISH & THE ONY WAY TO CATCH FEWER FISH IS TO FISH LESS.

MSBA urges ASMFC develop multiple options in Amendment 7 that increase effort control in order to reduce recreational fishing mortality.

MSBA supports the use of bag limits to control effort and urges a single fish bag limit in both the coastal and Chesapeake fisheries.

MSBA supports the use of size limits to control effort in both the coastal and Chesapeake fisheries. Our members continue to remember that it was a 36" size limit that rebuilt a depleted striped bass fishery in the 1980s and continue to question if concentrating effort into the current slot limit will allow enough fish to grow into an adequate distribution of year classes needed to sustain a healthy coastal breeding population. **We urge Amendment 7 to at least reconsider the slot limit vs a large minimum size limit.**

The MSBA membership as a whole believes that the stock is in even worse shape than indicated by the last stock assessment and feel strongly that the recent incremental regulatory improvements do not go far enough to stop what we believe is a steep decline in the striped bass fishery. **We feel additional effort control measures are needed now and should be developed as in Amendment 7. The obvious next step in effort control is for Amendment 7 to include consideration of establishing open & closed seasons for striped bass fishing.**

The following issues should be considered when developing and analyzing alternatives for open and closed seasons:

1: The primary benefit of developing an open & closed season for striped bass fishing is an easy to analyze mortality reduction under which the burden is shared by all participants in the fishery.

2: A secondary benefit and strategy for developing options under open & closed seasons would be to allow the coastal migrating stock to spread out along the coast prior to opening the season. This would reduce some fishing pressure on fish as they migrate and if crafted properly would allow an equal opportunity for anglers in each state/region to access a declining fishery.

3. Regulations requiring open & closed seasons should include a prohibition on catch and release fishing. Regulations should prohibit targeting striped bass using "gear capable of catching striped bass" when the season is closed. We believe law enforcement professionals can tell the difference between anglers targeting most other species except bluefish and our membership is willing to include closing the "Im targeting bluefish" loophole in order to reduce mortality in a declining striped bass fishery.

4: Of course, unintended catch of striped bass while fishing for alternative species like black sea bass is likely however companion regulations that require immediate return to the water of unintended catch are used in other fisheries. This type of regulation is working in states with open and closed trout fishing seasons, and we are not aware of a problem with unintended catch of trout while fishing for early spring largemouth bass.

5. Especially in the Chesapeake fishery, fishing for striped bass should be closed when water temperatures rise to a point that the chances for post release survival is decreased by some percentage.

MSBA suggests ASMFC include any and all ideas for additional effort control alternatives that could reduce recreational release mortality for consideration in draft Amendment 7.

8. Recreational Accountability

Consideration of angler accountability should be addressed in any FMP. Unfortunately, due to the size of the recreational striped bass fishery and the fact that the MRIP data collection program is not designed for this specific purpose, any discussion of recreational accountability beyond the perspective of an individual angler adhering to current regulations quickly becomes an overwhelmingly complicated task. When considering this subject and knowing that the majority of striped bass caught are released, this entire subject becomes a theoretical quagmire that will likely overtake what we feel are the other valid subjects being considered for inclusion in Amendment 7. We feel this subject is best addressed in a stand-alone action, possibly beginning with a working group that could begin the monumental task of trying to

frame a reasonable way to approach this subject in relation to this specific fishery. **It is for this reason MSBA recommends Recreational Accountability be removed from consideration in Amendment 7.**

9. Coastal Commercial Allocation

The MSBA membership contains a wide variety of fishermen, including commercial harvesters. Our membership as a whole has a wide variety of opinions when it comes to management and even the continued existence of commercial striped bass harvest. Specific to the question of coastal commercial allocation, MSBA has believes a 40+ year old baseline for commercial allocation "may" no longer be appropriate.

MSBA supports consideration of updating the coastal commercial allocation being included in draft Amendment 7.

10. Any Other Issues Concerning the Management of Atlantic Striped Bass

Gamefish Status for Atlantic Striped Bass:

A significant number of MSBA members and the striped bass fishing community as a whole are calling for ASMFC to consider gamefish status options within development Amendment 7. To ignore those calls for consideration would be a disservice to our membership and the community as a whole. Similar to other terms in fisheries management there are many nuanced definitions of the term "gamefish status". The MSBA membership has aggregations of members that support various versions of this management approach. We also recognize that any consideration of gamefish status will be overwhelmingly controversial and could derail what we see as needed reforms being considered in Amendment 7.

MSBA has long been opposed to efforts that force any version of gamefish status to be enacted through state-by-state legislation. That being said, we do feel that there is enough support within both our membership and our community to take the following position:

If there ever is going to be a species of fish or fishery that contributes so much value to the nation that it demands consideration as a recreational only species it is the Atlantic striped bass. We urge the ASMFC to acknowledge the call for consideration of gamefish status and find a way, whether via a working group or a future amendment to begin to think about how an ASMFC led national discussion of this issue could move forward.

Moratorium on All Harvest of Striped Bass:

MSBA suggests ASMFC include for analysis in Amendment 7; information related to the conservation benefits of a limited moratorium lasting 3, 5 & 10 years on all fishing for striped bass. We request this information be provided for both comparison purposes and because a growing number of our members have informed us, they feel the time has come for consideration of this drastic effort control option.

On behalf of our entire membership, we thank you in advance for your consideration of our expert opinions on these important issues.

Mike Jones
President
MA Striped Bass Association

Patrick Paquette
Govt Affairs Officer
MA Striped Bass Association

The Maryland Watermen's Association, Inc.

April 8, 2021

Atlantic States Fisheries Commission
Public Comment for Striped Bass

Biological Reference Points given the 2018 benchmark assessment found overfishing was not occurring and the SSB was below target. Even with the target during those years that the Striped Bass population was at a historical high level. The current reference points may be unattainable given current objectives for fishery performance. This is directly for the Public Informational Document page (7) (SSB spawning stock biomass). Why is this unthinkable because benchmarks were raised in 2002, 2007, 2013 and again in 2018? The target and threshold every 5 years has been raised until you reached historic levels. Are these Historic levels unmaintainable and realistic? There are no Management Triggers, this is a knee jerk reaction in one year. We need a 10-year plan to curtail overfishing without crippling our Fishery. Conservation Equivalency's is a part of good management practices. The Recreational Mortality releases need to be curved to a lower percentage. Recreational accountability needs to be implemented to same degree as the Commercial fishery. MRIP is not a good estimate. There should not be a double standard.

Very Respectfully,

Robert T. Brown, Sr.

Robert T. Brown, Sr
President
Maryland Watermen's Association INC.
240-925-1596

1805A Virginia Street Annapolis, MD 21401

PHONE (410) 216-6610 EMAIL: info@marylandwatermen.com

March 5, 2021

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I am a member and representative of a local fishing club in Rhode Island called the Narragansett Surfcaster. Our club is 95 members strong and growing. We all share the same comments for the PID Amendment 7. In principle, we are concerned with the initiation of a comprehensive amendment process when the striped bass fishery has far more urgent needs. The stock was declared overfished nearly two years ago, and while the Atlantic Striped Bass Management Board (hereafter referred to as the Striped Bass Board) took action to end overfishing through Addendum VI, there has not yet been any discussion of a rebuilding plan, despite Amendment 6's own requirement that the stock be rebuilt within 10 years of being declared overfished. Due to data uncertainties associated with the COVID-19 pandemic, it is uncertain whether Addendum VI's provisions were successful in curbing fishing mortality and putting the stock on a path to eventual recovery. Furthermore, some of the specific potential issues to be included in the amendment, such as Regional Management (Issue 5) and Recreational Release Mortality (Issue 7) are being considered for public input even as fisheries scientists are in the midst of research and modeling efforts to inform these issues.

All of this being said, we are aware that it is the will of the Striped Bass Board to move ahead with this amendment, and below we provide our thoughts on each of the issues presented in the PID.

Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that conservation equivalency should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that conservation equivalency injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Striped bass are the foundation of the recreational fishing community and economy along the east coast. Ensuring a healthy population is critical for ensuring that our businesses and Clubs are able to thrive. We urge the Striped Bass Board to put the resource first as it navigates the Amendment 7 process.

We thank you for your consideration of our comments.

Sincerely,

Kevin A Barrios, member of the Narragansett Surfcasters fishing club

Native Fish Coalition
PO Box 10
Pownal, ME 04069
info@NativeFishCoalition.org

April 9, 2021
Sent via electronic email

To the Atlantic States Marine Fisheries Commission:

I am writing on behalf of the Connecticut chapter of Native Fish Coalition (NFC) to comment on Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. NFC is a national 501(c)(3) non-profit conservation organization whose mission is to protect, preserve and restore wild native fish. NFC currently has chapters in Alabama, Connecticut, Maine, Massachusetts, New Hampshire, Pennsylvania and Vermont.

NFC recognizes the biological and economic importance of the Atlantic striped bass and believes that restoring a healthy stock made up of many year classes is vitally important for sustainability of the population. What follows is Native Fish Coalition's stance on each issue in the Public Information Document for Amendment 7.

Issue 1: Fishery Goals and Objectives – NFC accepts these current goals as sufficient and achievable. We believe the focus should be on rebuilding a robust striped bass population across a broad range of age classes. However, we do not believe that an economically viable striped bass commercial fishery should be a goal at this time as it has the potential to conflict with the primary goal of stabilizing the population.

Issue 2: Biological Reference Points – We continue to believe 1995 is an appropriate reference year, as the striped bass population was healthy across numerous age classes. We recommend that the BRPs remain unchanged, as using this reference point will help enable sustainable recovery.

Issues 3 & 4: Management Triggers & Stock Rebuilding Target and Schedule – We believe the Management Triggers established in Amendment 6 relating to spawning stock biomass, fishing mortality, and recruitment should be strictly adhered to and subsequently support significant regulatory changes to rebuild the striped bass population to target levels as soon as possible. We also believe the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. Ultimately, management stability should not be considered more important than rapid action towards rebuilding the population to a healthy, sustainable level.

Issue 5: Regional Management – Regional management is prudent in some cases. For example, Chesapeake Bay and other nursery areas for striped bass should be managed differently. In these spawning and nursery areas, seasonal closures should be considered as well as changes to the daily bag and size limits: The current practice of removing large breeding fish and overfishing juveniles in Chesapeake Bay is counter to management goals and stock recovery. Areas that have a very high nutrient load or other conditions that contribute to an overly stressful environment that may affect release mortality may warrant similar fishery closures. However, with the

striped bass population currently at a 25-year low, we support swift and strict regulatory action across striped bass range rather than slowing things down to take a different management approach at this time.

Issue 6: Management Program Equivalency (Conservation Equivalency) – NFC rejects Conservation Equivalency (CE) in its current form, as states implementing CE practices must be held accountable should their regulations fail to meet stated conservation objectives and goals of the ASMFC.

Issue 7: Recreational Release Mortality – Incidental mortality ("dead releases") of released striped bass is approximately 2.8 million fish per year according to the ASMFC, and 48% of this mortality results from fish released by recreational anglers. There is significant opportunity to improve this mortality rate for striped bass with some changes to permitted tackle and angling practices. We fully support the recent adoption in Addendum VI of inline circle hooks with the use of bait as it results in reduced deep hooking and higher survival rates. We also support the possibility of banning treble hooks and/or replacing them with inline circle hooks on artificial lures: Treble hooks (especially multiple trebles) can cause significant damage to fish and prolong the time the fish is out of water before release. Seasonal closures when environmental conditions are unfavorable to striped bass survival when released are prudent. Finally, NFC strongly believes in the value of educational outreach for the angling public regarding catch and release best practices. We would encourage the immediate requirement of an educational test and/or information on these practices before a license can be obtained.

Issue 8: Recreational Accountability – Setting, monitoring and enforcing a recreational harvest limit for striped bass would be extremely difficult to accurately achieve given the very high number of recreational striped bass anglers, and the unpredictability of how often they will fish in any given year. This is a large and long-term endeavor that would best be removed from Amendment 7 as there are more effective and immediate measures that can reduce mortality in the short term. We would prefer the focus at this time be on tackle restrictions, daily bag limits, and practices that reduce incidental mortality.

Issue 9: Commercial Allocation – NFC believes striped bass should be classified as a gamefish. A healthy and robust recreational striped bass fishery contributes significantly more to local and regional economies than a commercial fishery. With the striped bass population currently at a 25-year low, all commercial fisheries for striped bass should be suspended rather than expanded. Most of the striped bass commercial license holders are not making their primary living off of the fishery, but are instead using it as a means to supplement their income, or fund their recreation. The presence of a commercial fishery also allows for the existence of a black market. For example, in 2010 the US Fish and Wildlife Service apprehended suspects in the illegal harvest, sale and purchase of more than one million pounds of striped bass from Chesapeake Bay with a market value of up to $7 million (Forbes 2010). Low arrest and subsequent conviction records illustrate a lack of enforcement of existing laws. As an inshore fish, striped bass are very accessible to the masses, which compounds these problems. Furthermore, black market numbers and commercial discards have never been factored into the management equation and should have been historically counted against the commercial quota.

Native Fish Coalition appreciates the opportunity to comment on Amendment 7 and respectfully urges the Commission to take swift action to restore Atlantic striped bass stocks.

Sincerely,
Michael Day
Chair, Connecticut Chapter of Native Fish Coalition

CC: NFC National Board, NFC Connecticut Board

Na$ve Fish Coali$on
PO Box 10
Pownal, ME 04069
info@Na$veFishCoali$on.org MassachuseCs
April 9, 2021
Sent via electronic email

To the Atlan$c States Marine Fisheries Commission:

I am wri$ng on behalf of the MassachuseCs chapter of Na$ve Fish Coali$on (NFC) to comment on Amendment 7 to the Interstate Fishery Management Plan for Atlan$c Striped Bass. NFC is a na$onal 501(c)(3) non-profit conserva$on organiza$on whose mission is to protect, preserve and restore wild na$ve fish. NFC currently has chapters in Alabama, Connec$cut, Maine, MassachuseCs, New Hampshire, Pennsylvania and Vermont.

NFC recognizes the biological and economic importance of the Atlan$c striped bass and believes that restoring a healthy stock made up of many year classes is vitally important for sustainability of the popula$on. What follows is Na$ve Fish Coali$on's stance on each issue in the Public Informa$on Document for Amendment 7.

Issue 1: Fishery Goals and Objec$ves – NFC accepts these current goals as sufficient and achievable. We believe the focus should be on rebuilding a robust striped bass popula$on across a broad range of age classes. However, we do not believe that an economically viable striped bass commercial fishery should be a goal at this $me as it has the poten$al to conflict with the primary goal of stabilizing the popula$on.

Issue 2: Biological Reference Points – We con$nue to believe 1995 is an appropriate reference year, as the striped bass popula$on was healthy across numerous age classes. We recommend that the BRPs remain unchanged, as using this reference point will help enable sustainable recovery.

Issues 3 & 4: Management Triggers & Stock Rebuilding Target and Schedule – We believe the Management Triggers established in Amendment 6 rela$ng to spawning stock biomass, fishing mortality, and recruitment should be strictly adhered to and subsequently support significant regulatory changes to rebuild the striped bass popula$on to target levels as soon as possible. We also believe the 10-year rebuilding $meline currently specified in Amendment 6 should be maintained. Ul$mately, management stability should not be considered more important than rapid ac$on towards rebuilding the popula$on to a healthy, sustainable level.

Issue 5: Regional Management – Regional management is prudent in some cases. For example, Chesapeake Bay and other nursery areas for striped bass should be managed differently. In these spawning and nursery areas, seasonal closures should be considered as well as changes to the daily bag and size limits: The current prac$ce of removing large breeding fish and overfishing juveniles in Chesapeake Bay is counter to management goals and stock recovery. Areas that have a very high nutrient load or other condi$ons that contribute to an overly stressful environment that may affect release mortality may warrant similar fishery closures. However, with the striped bass popula$on currently at a 25-year low, we support swih and strict regulatory ac$on across striped bass range rather than slowing things down to take a different management approach at this $me.

Issue 6: Management Program Equivalency (Conserva$on Equivalency) – NFC rejects Conserva$on Equivalency (CE) in its current form, as states implemen$ng CE prac$ces must be held accountable should their regula$ons fail to meet stated conserva$on objec$ves and goals of the ASMFC.

Issue 7: Recrea$onal Release Mortality – Incidental mortality ("dead releases") of released striped bass is approximately 2.8 million fish per year according to the ASMFC, and 48% of this mortality results from fish released by recrea$onal anglers. There is significant opportunity to improve this mortality rate for striped bass with some changes to permiCed tackle and angling prac$ces. We fully support the recent adop$on in Addendum VI of inline circle hooks with the use of bait as it results in reduced deep hooking and higher survival rates. We also support the possibility of banning treble hooks and/or replacing them with inline circle hooks on ar$ficial lures: Treble hooks (especially mul$ple trebles) can cause significant damage to fish and prolong the $me the fish is out of water before release. Seasonal closures when environmental condi$ons are unfavorable to striped bass survival when released are prudent. Finally, NFC strongly believes in the value of educa$onal outreach for the angling public regarding catch and release best prac$ces. We would encourage the immediate requirement of an educa$onal test and/or informa$on on these prac$ces before a license can be obtained.

Issue 8: Recrea$onal Accountability – Sen ng, monitoring and enforcing a recrea$onal harvest limit for striped bass would be extremely difficult to accurately achieve given the very high number of recrea$onal striped bass anglers, and the unpredictability of how oh en they will fish in any given year. This is a large and long-term endeavor that would best be removed from Amendment 7 as there are more effec$ve and immediate measures that can reduce mortality in the short term. We would prefer the focus at this $me be on tackle restric$ons, daily bag limits, and prac$ces that reduce incidental mortality.

Issue 9: Commercial Alloca$on – NFC believes striped bass should be classified as a gamefish. A healthy and robust recrea$onal striped bass fishery contributes significantly more to local and regional economies than a commercial fishery. With the striped bass popula$on currently at a 25-year low, all commercial fisheries for striped bass should be suspended rather than expanded. Most of the striped bass commercial license holders are not making their primary living off of the fishery, but are instead using it as a means to supplement their income, or fund their recrea$on. The presence of a commercial fishery also allows for the existence of a black market. For example, in 2010 the US Fish and Wildlife Service apprehended suspects in the illegal harvest, sale and purchase of more than one million pounds of striped bass from Chesapeake Bay with a market value of up to $7 million (Forbes 2010). Low arrest and subsequent convic$on records illustrate a lack of enforcement of exis$ng laws. As an inshore fish, striped bass are very accessible to the masses, which compounds these problems. Furthermore, black market numbers and commercial discards have never been factored into the management equa$on and should have been historically counted against the commercial quota.

Na$ve Fish Coali$on appreciates the opportunity to comment on Amendment 7 and respecqully urges the Commission to take swih ac$on to restore Atlan$c striped bass stocks.

Sincerely,
Robert M. Dalton Jr
Chair, MassachuseCs Chapter of Na$ve Fish Coali$on

CC: NFC Na$onal Board,
NFC MassachuseCs Board

Native Fish Coalition
PO Box 10
Pownal, ME 04069
info@NativeFishCoalition.org

April 9, 2021
Sent via electronic email

To the Atlantic States Marine Fisheries Commission:

I am writing on behalf of the Maine chapter of Native Fish Coalition (NFC) to comment on Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. NFC is a national 501(c)(3) non-profit conservation organization whose mission is to protect, preserve and restore wild native fish. NFC currently has chapters in Alabama, Connecticut, Maine, Massachusetts, New Hampshire, Pennsylvania and Vermont.

NFC recognizes the biological and economic importance of the Atlantic striped bass and believes that restoring a healthy stock made up of many year classes is vitally important for sustainability of the population. What follows is Native Fish Coalition's stance on each issue in the Public Information Document for Amendment 7.

Issue 1: Fishery Goals and Objectives – NFC accepts these current goals as sufficient and achievable. We believe the focus should be on rebuilding a robust striped bass population across a broad range of age classes. However, we do not believe that an economically viable striped bass commercial fishery should be a goal at this time as it has the potential to conflict with the primary goal of stabilizing the population.

Issue 2: Biological Reference Points – We continue to believe 1995 is an appropriate reference year, as the striped bass population was healthy across numerous age classes. We recommend that the BRPs remain unchanged, as using this reference point will help enable sustainable recovery.

Issues 3 & 4: Management Triggers & Stock Rebuilding Target and Schedule – We believe the Management Triggers established in Amendment 6 relating to spawning stock biomass, fishing mortality, and recruitment should be strictly adhered to and subsequently support significant regulatory changes to rebuild the striped bass population to target levels as soon as possible. We also believe the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. Ultimately, management stability should not be considered more important than rapid action towards rebuilding the population to a healthy, sustainable level.

Issue 5: Regional Management – Regional management is prudent in some cases. For example, Chesapeake Bay and other nursery areas for striped bass should be managed differently. In these spawning and nursery areas, seasonal closures should be considered as well as changes to the daily bag and size limits: The current practice of removing large breeding fish and overfishing juveniles in Chesapeake Bay is counter to management goals and stock recovery. Areas that have a very high nutrient load or other conditions that contribute to an overly stressful environment that may affect release mortality may warrant similar fishery closures. However, with the

striped bass population currently at a 25-year low, we support swift and strict regulatory action across striped bass range rather than slowing things down to take a different management approach at this time.

Issue 6: Management Program Equivalency (Conservation Equivalency) – NFC rejects Conservation Equivalency (CE) in its current form, as states implementing CE practices must be held accountable should their regulations fail to meet stated conservation objectives and goals of the ASMFC.

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Native Fish Coalition appreciates the opportunity to comment on Amendment 7 and respectfully urges the Commission to take swift action to restore Atlantic striped bass stocks.

Sincerely,
Tom Johnson
Chair, Maine Chapter of Native Fish Coalition

CC: NFC National Board, NFC Maine Board

Native Fish Coalition
PO Box 10
Pownal, ME 04069
info@NativeFishCoalition.org

April 9, 2021
Sent via electronic email

To the Atlantic States Marine Fisheries Commission:

I am writing on behalf of the New Hampshire chapter of Native Fish Coalition (NFC) to comment on Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. NFC is a national 501(c)(3) non-profit conservation organization whose mission is to protect, preserve and restore wild native fish. NFC currently has chapters in Alabama, Connecticut, Maine, Massachusetts, New Hampshire, Pennsylvania and Vermont.

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Native Fish Coalition appreciates the opportunity to comment on Amendment 7 and respectfully urges the Commission to take swift action to restore Atlantic striped bass stocks.

Sincerely,
Justin Hardesty
Chair, New Hampshire Chapter of Native Fish Coalition

CC: NFC National Board, NFC New Hampshire Board

From: Richard E. Strzepek
Sent: Wednesday, April 7, 2021 9:54 PM
To: Comments
Subject: [External] FW: Striped Bass PID Comments

Importance: High

NORTH FORK ANGLERS, MATTITUCK NY 11952

Emilie Franke, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board

The North Fork Anglers Fishing Club is a 34-member fishing club located on the North Fork on the East End of Long Island New York. Our members are dedicated environmentalists, conservationists and catch and release surfcasters. Many of the members have lived through good striped bass fishing years and very poor fishing years and lived through the Moratorium and experienced the rebound in the striped bass stock to experience some wonderful fishing.

We ask the Management Board to do everything in its power to ensure a robust and sustainable striped bass fishery. We realize that there are many complex factors which must be considered.

Our comments are general in nature:

1. Adequate and quality data and robust detailed statistical analysis is absolutely necessary for accurate and valid conclusions to be determined. The Management Board should seek to facilitate a concerted effort to initiate improved and comprehensive data collection from as many reputable sources as possible.

2. We urge the Management Board to not propose lowering the total biomass threshold of the fishery.

3. We believe that the concept of Conservation Equivalent is susceptible to manipulation and abuse and should therefore this option should not be included in any final regulatory decision.

Attached is a complete member roster. All members have approved these comments and request that you consider this comment submission as 34 individual comment submissions.

Thank you for your consideration of our comments and we hope this Amendment effort will lead to a stable and vibrant striped bass population for our children and grandchildren to enjoy the fishing we love.

For the North Fork Anglers Fishing Club,
Lawrence Welcome, President
Michael Lisowy – Vice President
Steve Kellner – Treasurer
Richard Strzepek – Secretary
Leif Gobel – Board Member
Dennis Borowsky – Board Member
John Tomici – Board Member

From: Rsquire
Sent: Tuesday, March 30, 2021 2:33 PM
To: Comments
Subject: [External] Striped Bass PID

March 30, 2021

Emile Franke
Fishery Management Plan Coordinator
ASMFC
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

Dear Emile,

I am writing to provide input on the Striped Bass Public Information Document (PID) for Amendment 7. I currently serve as the President of the New York Coalition for Recreational Fishing (NYCRF), a non-profit organization dedicated to the preservation and conservation of our marine resources and expanded fishing access. The NYCRF is made up of individual members and clubs and organizations that share our mission. We currently number close to 2,000 members.

My letter will provide answers to the questions posed in the PID. However, I need to begin with some comments regarding the Board's management of the striped bass fishery. In short, the Management Board has lost the confidence of a large percentage of the recreational sector. Under the Management Board's direction, the striped bass fishery went from a rebuilt fishery to a fishery that is now overfished with overfishing occurring. This depletion of the fishery did not occur overnight. The best available science has been indicating this decline for over ten years. The Management Board was provided ample notice however their actions were slow and inadequate.

What is most troubling is that there has never been an accounting for this failure. At no point has the public been provided an explanation for this failure, either in the Board's missteps, in the existing Amendment, or with the science that may have prevented the Board from taking appropriate action. We are being asked to comment on a new Amendment without being provided with a clear illustration of how the Amendment failed the Board and the public in protecting the most valuable species under its management.

During the development of both Addendum IV and Addendum VI the public spoke in a large and unified voice for options that had a greater likelihood of success. The Board decided to disregard the overwhelming public opinion and selected harvest reduction options with a lower probability of succeeding.

The public is now again being asked for its input and my expectation is that

they will again speak out in favor of items that seek to protect the short- and long-term viability of the fishery that have the greatest likelihood of success. This is of course if they are not already resigned to the fact that their voice is of no concern to the Management Board and how they manage the Striped Bass fishery.
We urge the Management Board to answer the following questions:

- Does the Management Board accept any responsibility for the depletion of the striped bass fishery?
- What actions or inactions contributed to a once rebuilt striped bass fishery becoming overfished with overfishing occurring?
- What actions are required to ensure that these issues do not arise in the future?
- What language contained within Amendment 6 contributed to the depletion of the striped bass fishery?
- What recourse is there, or should there be, for a Management Board that disregards the guidance contained in their Interstate Fishery Management Plan?
- How should the success of the Management Board be measured and assessed?

Our observation is that the Striped Bass Management Board has not acted consistent with the short- and long-term health of the fishery. Over the last 10 to 15 years, the management of this valuable resource has turned what was once the defining success story of the ASMFC to a disappointing failure.

I am not sure if there is anything that we as the public can do to alter the mindset and current management practices of this Management Board. I do know that the public is frustrated and disappointed with the ASMFC's poor management of the fisheries under their charter. The most recent Stock Status Overview clearly illustrates this point. The public's lack of confidence in the Management Board and the ASMFC should not be confused with their resolve to make sure that our marine resources are protected. My sincere hope is that some self-reflection and common sense will move the Management Board to act with wisdom and with the short- and long-term health of the striped bass fishery guiding their decisions.

Sincerely,

Ross Squire

Ross Squire
President, New York Coalition for Recreational Fishing

In response to the PID, the NYCRF offers the following public comments:

Issue 1: In response to Issue 1 of the PID, the NYCRF recommends changing the current goal to " To perpetuate, through cooperative

interstate fishery management, migratory stocks of striped bass; characterized by a broad age structure, a self-sustaining spawning stock; and also to provide for the restoration and maintenance of their essential habitat." There should be no question for the Management Board or the public as to the primary overarching goal of the Fishery Management Plan.

Issue 2: In response to Issue 2 of the PID, the existing biological reference points should not be changed.

Issue 3: Management Triggers 1, 2, 3 and 4 should remain unchanged; Management Trigger 5 has proven to be ineffective. The NYCRF recommends altering Management Trigger 5 to include a recruitment failure time period of a 3 year rolling average or 3 out of 5 years. This Management Trigger should also include language requiring the Management Board to take immediate, not discretionary, action.

Issue 4: There should be no change made to the current 10 year rebuilding timeline that appears in Amendment 6.

Issue 5: Recent research by the University of Maryland's Center for Environmental Science brings into question the assertion made by some states that the Chesapeake is primarily a male dominated striped bass fishery. This assertion is a primary grounding used to recommend the change to regional management. In addition, we are not aware of any peer reviewed studies that support stock-specific or regional management. No changes to regional management should be considered until there is further investigation.

Issue 6: The issue with conservation equivalency (CE) is not the intent of CE but rather how CE options are managed. States should have some flexibility in how they implement harvest reductions however these options must be actively managed annually, at the state level, to ensure that they meet the intended state-wide fishery management goals. As an example, in Addendum IV, Maryland's CE option failed in meeting two of the stated objectives. After being allowed to present CE options that met a 20.5% harvest reduction as compared to the 25% required of all other states, Maryland's CE option resulted in the gross overharvesting of striped bass, even at the reduced 20.5% level. The Board was aware of this gross overage and took no action. Additionally, Maryland's CE option contributed to Addendum IV's failure in protecting the 2011 year class. In the future, this should never be allowed to happen again. Each state should be held to meet their harvest reductions and the goals and objectives of an addendum. Until corrections are made in the CE process, no additional CE options should be considered.

The NYCRF recommends that in the event CE options are implemented, any variation 25% or greater from the required harvest reduction should require the state to implement alternative options approved by the

Technical Committee that bring that state back into compliance.

Issue 7: All issues that can contribute to lessening the number of dead releases should be considered. This includes the use of gaffs, barbed treble hooks, and spear guns. While these options may contribute to lessening the number dead releases, there is nothing that will prove as effective as increased angler education. The ASMFC should investigate providing grants or compelling states to allocate annual funding for coastwide education programs that address:

- Importance of building an abundant fishery
- Striped bass fish handling best practices
- Proper gear and methods
- Effective use of circle hooks
- Responsible harvesting
- Adherence to regulations

The Management Board may want to investigate whether this education can be a requirement built into the Recreational Marine Fishing Registry system.

Issue 8: We question the availability of accurate data collection methods that would allow for the management and assessment of a recreational harvest target. Until accurate and reliable data collection methods are established the consideration of recreational harvest limits for striped bass should be tabled.

Issue 9: No changes should be made to the existing coastal commercial allocation methods. As with the recreational sector, the commercial sector should also be required to investigate and implement new approaches, rules and regulations that would lower the number of their dead discards.

Issue 10: The NYCRF offers the following additional comments for rebuilding and protecting the striped bass fishery.

- The Management Board on two separate occasions failed to take required action when Management Trigger 4 was reached. Any changes to Amendment 6 need to address consequences faced by a Board that fails to take appropriate action, as indicated in the Amendment.
- The Technical Committee should be tasked with conducting a retrospective analysis to determine the impact any proposed changes to Amendment 6 would have had on the health and management of the striped bass fishery. Would the proposed change have prevented the fishery from becoming depleted? Any proposed changes that are found to produce results inconsistent with the Fisheries Management Plan should be automatically excluded from being included in Amendment 7.
- It was disclosed that the Technical Committee did not factor in the impact of the historically-large 2011 year class when they evaluated Maryland's Addendum IV proposal. Institutional and operational changes should be implemented so that this does not occur in the future.

PLUM ISLAND SURFCASTERS

www.plumislandsurfcasters.org

To: Atlantic Striped Bass Advisory Panel

I am the legislative representative for the Plum Island Surfcasters, a 400-member North Shore Massachusetts fishing club. Please find below our club comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass for your consideration.

Issue 1 – Fishery Goals and Objectives:

Refine objectives 3 and 4 as follows:

- Provide a management plans that strives to maintain coastwide consistency of implemented measures, while allowing limited States flexibility to implement alternative strategies that fully meet the objectives of the FMP as determined by the Technical Committee.
- Maintain stock levels that will foster high quality and economically viable recreational, for-hire. And commercial fisheries.

The main themes the club supports are the first two objectives on maintaining abundance and managing at target levels, and the last objective on maintaining an abundance of older breeders at 2000 estimate.

Issue 2 – Biological Reference Points:

We support continuing to use the 1995 estimates for female SSB for determining stock status and the 25% level buffer for target level. If we had focused more on reaching the target threshold instead of trying to appease the various users and States, we would not be where we are now and could consider adjusting the reference points. Until we have a better understanding we should continue to use the 1995 estimates. The balance should be focused on maintaining spawning stock and exploitation at target levels and taking action exponentially rather than gradual when the targets are not met.

Issues 3 and 4 – Management Triggers and Stock Rebuilding Targets and Schedule:

For the last ten years many in the fishing community have identified a continuing rapid decline in the stock while the board has made small changes in steps to address the issue trying to keep the various user groups happy. This method has failed time and again across much of our fishing stocks. We need a higher focus on rebuilding the stock quickly because in the end this will have the least impact on the fishery. Use of gradual changes has gotten us to our current state contributing to a lack of faith in the ASMFC.

Issue 5 – Reginal Management:

We do not take issue with having a separate regional management plan for the Chesapeake Bay as long as the Technical Committee supports it. We do not support including or making any additional regional plans other than the Chesapeake Bay and ocean region. Our only concern is related to adjustments that may be needed due to fluctuations in YOY for a fishery that allows taking small fish.

Issue 6 – Management Program Equivalency (CE):

The use of Conservation Equivalencies should be very limit and only allowed if the Technical Committee agrees that a CE more than meets the FMP. The use of CE should be clearly defined and tied to proven data. They should not be used to try to balance the catch equally among the states for a migratory fish. Past observations of board meetings seem to indicate this type of CE is agreed upon more due to getting board members to agree on a change rather than science and what is best for the fish recovery.

Issue 7 – Recreational Release Mortality:

Since released fish account for almost half of the total fish mortality each year it should be a management focus point. Some felt that it should be a specific objective under issue 1. We feel there are options available to help reduce the release mortality, such as, barbless hook requirement and requiring a hook extraction tool.

Issue 8 – Recreational Accountability:

We do not support the use of Recreational Harvest Limit (RHL) at this time due to concerns that the science not being developed at a level to support its use for striped bass. To better account for recreational activity consider developing a voluntary system for reporting catch data on a trip basis using the internet. One example of a data collection method would be the one used by New Hampshire.

Issue 9 – Coastal commercial Quota Allocation:

With the increase in numbers of recreational fisherman and the shift in the economic value of striped bass to recreational fishing the commercial quota should be adjusted to address this. It should also be recognized that in states like Massachusetts the commercial fishing is concentrated on catching the larger spawning fish.

Issue 10 – Other Issues:

There should be specific standards to ensure commercially caught fish are tagged when caught and verified that they are sold to a commercial broker. Currently only 25% of people holding a commercial license in Massachusetts report selling any fish. For short money, a commercial license can be purchased allowing for the person to catch fish outside of the recreational limits and either keeping them or selling them under the table, so they end up not being counted towards the commercial quota.

States should be encouraged to treat minor fishing violations more like traffic violations with a summons issued not requiring a court appearance. A common statement from the law enforcement people is that courts do not take fishing violation seriously.

Thank You

Michael Toole

Plum Island Surfcaster Board - Legislative Representative

603-765-6299

toolemf@hotmail.com

April 9, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

RE: Atlantic Striped Bass Public Information Document Comments

Dear Ms. Franke:

Please accept the following comments from the Recreational Fishing Alliance (RFA) regarding the public information document for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

Before commenting specifically on the questions posed in the public information document for Amendment 7 to the striped bass FMP, RFA felt it was necessary to revisit Addendum 6. Regulations associated with Addendum 6 were implemented in 2020. Those measures were implemented with the goal of ending overfishing, achieving a 18% reduction in fishing mortality and initiating rebuilding in the stock. Addendum 6 measures included a slot limit (7" span) for the coastal migratory stock which is very restrictive. In addition, states were required to impose regulations that require the use of circle hooks when fishing for striped bass with bait. Preliminary MRIP estimates indicate that recreational catch and harvest has declined roughly 12%. With respect to the objectives of Addendum 6, RFA asked during the public hearings for Amendment 7 what progress has been made toward the Addendum 6 objectives. The response from ASMFC staff was that it was unknown how much progress has been made toward the 18% reduction of F and that such information would not be available until the next stock assessment is conducted in 2022. Given that the recreational fishery is already highly restricted, that declines of recreational catch and harvest are being observed in recent years, RFA suggests that no be taken on Amendment 7 until the results of the next striped bass stock assessment is conducted. The stock is not in crisis from a historical perspective and it appears that further restrictions to the recreational fishery may not result in any measurable benefits with regard to rebuilding. We also want to avoid being highly reactive and micromanaging this fishery without first knowing the outcome for action taken under Addendum 6. RFA believes that the most responsible

course of action would be to not take final action on Amendment 7 until the 2023 winter meeting.

RFA provides the following comments specific to the questions posed in the PID for Amendment 7.

Issue 1. Fisheries Goals and Objectives

RFA believes that the goal of the Atlantic Striped Bass FMP warrants consideration for possible revision. In particular, RFA suggests that the following portion of the existing goal should be revisited. The goal includes "*provide for the restoration and maintenance of their essential habitat.*" Detrimental impacts to habitat resulting from changing environmental conditions due to point and non-point discharge of pollutants, increased water temperature and climatic shift have a significant impact on reproductive yield and year class performance of striped bass. Habitat along with environmental conditions will play a significant role in meeting the objectives of the FMP, perhaps even more so then directed fishing mortality. If the Atlantic States Marine Fisheries Commission (ASMFC) expects to achieve the other goals and objectives with this fishery, it must take a more active role with habitat issues.

With respect to the objectives listed in Issue 1, RFA provides the following comments.

Objective 2: Based on the 1982-2016 stock size plotted against recruitment figure (Figure 3.), the current level of biomass falls within a range that should produce adequate, even above average recruitment when compared to the 1994 through 1999 time period. If fishing morality for age-0 striped bass is exceedingly low, it can be inferred that the cause of below average recruitment observed in the 2005-2010 and 2012-2014 time periods are not attributed to fishing. RFA suggests that a term of reference be included in the 2022 stock assessment that evaluates the overall reproductive contribution of each size class. Management should use these findings so that measures can be adaptive and focused on the most reproductively valuable size classes.

Objective 3: While it may seem reasonable to seek consistent regulations on a coastwide manner, the reality is that there is a wide range in terms of catch length frequency along the coast. If the goal of the fmp is to provide anglers with reasonable access to the fishery across all mode types then it is necessary to provide states the flexibility to implement comparable regulations in their waters. In addition, with some states having producer areas, it would make sense to afford those states the ability to set measures to distribute harvest mortality among a broader range of size classes.

Objective 4: RFA suggests the inclusion of wording in this section that seeks to take into consideration the various interests within the recreational fishery including the consumptive, trophy, and catch and release aspects of the fishery. The angler who desires to take a fish home to eat must be considered in the management of this fishery.

Objective 7: It appears that a greater portion of the age 15 and older fish are spending more time in areas where directed fisheries are prohibited or in areas outside of U.S. jurisdiction. In addition, fisheries independent surveys that operated in those particular areas are too designed or intended to capture larger striped bass. It has been suggested that a significant portion of these older striped bass are simply not being intercepted as they had in the past. If true, this theory would call into question the need to adjust fishing mortality targets to accommodate these older fish and drive a greater need to update or refine sampling methods to capture these encounters. One suggestion might be to have ASMFC forward a request to NOAA Fisheries to evaluate fishing mortality outcomes if a directed recreational catch and release fishery for striped bass was allowed in federal waters. The prohibition on striped bass possession in federal waters should still stand but by allowing catch and release fishing for striped bass in federal waters, recreational catch estimates from the EEZ might capture more information on these larger fish. RFA also suggests that perhaps not enough is being done to protect pre-spawn fish. ASMFC might want to consider options to limit directed fishing, even catch and release fishing, for striped bass before they have had a chance to spawn. The current available information on the impact of catch and release fishing on spawning activity is extremely limited. RFA believes the ASMFC needs to investigate this issue in more detail and/or gather more conclusive information on the topic to determine whether this is an issue that needs to be addressed.

Issue 2: Biological Reference Points.

RFA suggests that the current BRP might be outdated. While the fishery may have been rebuilt in 1995 and reached historic high levels of abundance in the mid-2000's under these BRP's, its reasonable to believe that the fishery and the environmental conditions have changed in that roughly 20 year period and that using BRP based on stock in the 1990's may not be best approach at the current time. RFA suggests including a term of reference request for the 2022 stock assessment to include an evaluation of the current BRP and if more recent time periods or if environmental factors may produce more representative BRP's.

With regard to natural mortality, the value of M in the second natural mortality period for both age groups is much higher than the commonly assumed, biological based value of M=0.15. While the large inter-period variation and large estimate of M should be viewed with caution, the fact that all of the tagging programs show an increase in M across periods suggests that it is likely M has increased in the stock. This change should be solely applied to natural mortality and not fishing mortality.

Issue 3: Management Triggers:

RFA has observed that there is a widening disconnect between female SSB and recruitment. It is also noted that there is a higher level of variability with regard to some of the aspects of the fishery used to prompt management responses. RFA believes that it is important to evaluate the current management triggers and to determine if management action imposed on the fisheries is still having a positive and measurable impact on the stock. Noting the current recreational

measures in this fishery which are already highly restrictive, RFA would caution against triggers that force mandatory regulatory action.

Issue 4: Stock Rebuilding Target and Schedule:
RFA believes that the current stock rebuilding target needs to be reevaluated. Considering that even when the striped bass stock reached a historic high level of abundance in 2005/2006 that the rebuilding target was not achieved, it would appear that the rebuilding target may be inappropriate in light of the productivity of the stock and environmental factors that influence reproductive output. Leakage of striped bass out of US waters must also be considered in setting rebuilding targets. In addition, predation of striped bass by marine mammals and white sharks appears to have increased substantially in the past 5 years. As for rebuilding timelines, RFA does not support a fixed timeframe for rebuilding at this time. Given the uncertainty with regard to how the striped bass stock seems to have a diminishing return in response to management action, selecting a fixed rebuilding time frame sets up a mandate that is doomed to fail at great cost to the industry. RFA also suggests maintaining a fishing mortality rate that is expected to maintain the stock above the management triggers.

Issue 5: Regional Management
The status of the stock and condition of the Atlantic Striped Bass fishery is widely dictated on a regional basis. However, the data to assess and manage the stock on finer geographic scales is inadequate. RFA supports greater resources being devoted to evaluating the Atlantic Striped bass on a regional scale such that management can be better tailored to the condition of different stocks or areas of the resource.

Issue 6: Conservation Equivalency
RFA supports the continued use of conservation equivalent management for striped bass. While conservation equivalent allows states to set measures to accommodate the needs of their particular fisheries, it may also allow a more representative

Issue 7: Recreational Release Mortality
Given the recent analysis that found that modest changes (+/ - 15%) to recreational discard mortality rate had inconsequential impacts on the overall statue of the striped bass stock, coupled with the issues and confusion surrounding the circle hook regulation that went into effect January 1, 2021, RFA is requesting that the circle hook mandate be converted to a voluntary conservation measure until January 1, 2023. This would allow managers to evaluate different techniques and uses of bait with j hooks and allow the industry to design and manufacture a range of circle hooks that accommodate the needs of recreational striped bass fishermen.

Issue 8: Recreational Accountability
RFA suggests that this section be stricken from the amendment. When a recreational angler follows the regulations set by federal or state regulators that angler is being accountable and nothing further should be expected of that angler. As a whole, the recreational fishing sector is a

cross section of the public. The public is allowed to access and partake in recreational fishing without obstruction such as limited entry or other capacity control measures. A goal of fisheries management should be to rebuild and maintain fish stock to the benefit of commercial and recreational fishermen. As this success becomes realized, a positive consequence should be that more recreational anglers enter the fishery. RFA firmly supports the continuation of allowing the public open access to the striped bass resource. In general, RFA does not agree with the tone of this section and suggests that it be removed from the document.

Issue 9: Coastal Commercial Quota Allocation

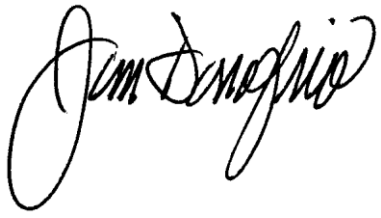
RFA does not offer any comments on the allocation of commercial striped bass quota. However, RFA does support the continuation that states retain to manage their commercial quota as they fit and are consistent with the FMP. That would also include the use of commercial quota for conservation purposes or being allocated for recreational uses.

Issue 10: Other Issues

RFA suggests that the ASMFC devote greater resources towards work that stands to gain a better understanding on the role climate change will play with the rebuilding efforts of Atlantic Striped Bass. As mentioned previously, recruitment appears to be less correlated with spawning stock biomass and more with environmental conditions. Understanding this interaction with climate change may provide a greater chance for success and perhaps better opportunities for fishermen.

Thank you for the opportunity to comment on this important topic.

Sincerely,



Jim Donofrio
Executive Director

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March 18, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Striped Bass PID

Dear Ms. Franke,

On behalf of the 60 members of the R.I. Party and Charter Boat Association, I would like to submit the following comments regarding the initiation of ASMFC's Amendment 7 to the Atlantic Striped Bass FMP. The most important species to Rhode Island's charter fishing industry and to those who fish abord our vessels is unquestionably Striped Bass. The actions under consideration in Amendment 7 have the potential to significantly impact our businesses and the experiences of our clients. We appreciate the opportunity to offer our thoughts from the perspective of the small business owner that relies on Striped Bass to operate.

Goal and Objectives:

We believe the current goal of the FMP is appropriate and meets the needs of our modern-day fishery. In addition to many of the current objectives that seek to achieve the FMP goal, we feel a strong message needs to be included in the objectives that recognizes a need to preserve the historic value of Striped Bass as a food fish. We recognize according to recreational catch data; a significant portion of the current Striped Bass fishery is a recreational catch and release type fishery. Rebuilding efforts, age structure of the stock, and social changes have shifted the historic food fishery towards a catch and release fishery, but we feel the folks who wish to fish for striped bass for a meal and those folks who wish to purchase striped bass at a market should be able to continue that long standing practice and the objectives should make that clear.

Under the current FMP, only the mortality associated with harvest is managed. Recreational release mortality is the most significant contributor to overall mortality, yet that mortality goes unchecked by management. There ought to be an objective that would recognize all release mortality and strive to limit that mortality to the extent practicable. We do not think it is reasonable to put the burden of rebuilding squarely on the backs of the fishing community who wish to harvest and eat a Striped Bass, while ignoring a major driver of mortality.

An objective in the current FMP that reads" Establish a fishing mortality target that will result in a net increase in the abundance (pounds) of age 15 and older striped bass in the population, relative to the 2000

estimate" is redundant and addressed within the first two objectives. We recommend removing this objective.

The Striped Bass are part of a higher trophic level, with an important position in the ecosystem. Managing this species for abundance, at the request of and benefit to a portion of the recreational fishery ignores the impacts abundance would have on the ecosystem and artificially influences nature. We strongly suggest analyzing the impacts that managing for abundance would have on other important commercial and recreational fisheries well before considering this an objective as suggested by some. Herring as example are in tough shape, is an abundance of Striped Bass in the best interest of those rebuilding efforts currently required for Herring?

All stakeholders who enjoy Striped Bass need to be respected when considering this FMP's Goals and Objectives. A balanced FMP, one that recognizes the diversity of communities that value Striped Bass for a variety of reasons, should be a guiding theme for the future of Striped Bass management. RI's for hire fleet benefits from management stability and regulatory consistency, but there is a continued need for some level of flexibility to allow for regional and modal specific needs.

The RIPCBA supports reviewing the current BRP's. New recreational catch estimates, developed under a new methodology, have significantly affected the influence of recreational catch relative to fishing mortality and the fishing mortality reference point. Female SSB, now linked to the fishing mortality reference point as opposed to MSY, would also be influenced by new higher recreational catch. A review of the BRP's would be appropriate to assure FMP goals and objectives are still achieved. The 25% buffer seems excessive considering improvements to assessment modeling, reducing the buffer to something less arbitrary should be considered.

Management triggers are important to include as metrics for action to maintain healthy stocks of Striped Bass. Consideration should be given to the variability of recreational catch estimates and the impacts of that variability on fishing mortality rates and female SSB. Any trigger based on a single year of recreational catch estimates should be avoided where a 3- or 5-year average could be considered instead. Juvenile Abundance Index may be subject to influence by climate change, to the extent that northern spawning areas could be taking on a larger role in the success of Striped Bass. The Commission should support research that examines this point. Mitigating impacts to fisheries, while rebuilding the Striped Bass stock in a reasonable 10-year timeline, is the best approach to allow all stakeholders the ability to enjoy Striped Bass over time.

Conservation Equivalency should be maintained as an option for states to use in the Striped Bass FMP.

Recreational release of Striped Bass has been trending up over the past decade, partly due to management measures put in place to lower harvest of Striped Bass. The RIPCBA is concerned about this trend and the fact that conservation has been placed squarely on the backs of recreational anglers who desire to take a Striped Bass home to eat. AMD IV reduced the possession limit to 1 fish per person and AMD VI further limited harvest through the implementation of a slot limit. The increased release associated with these management measures contributes to the overall release of Striped Bass. The mortality associated with those management driven releases works against rebuilding efforts. The FMP should consider measures that allow fishermen who wish to release all the fish they catch to bear a share of the rebuilding responsibility. An angler that wishes to take a fish home to eat can no longer bear all responsibility for

rebuilding and conservation. The RIPCBA feels this is a particularly important point that the board should address through AMD 7 and we would like to see some credit given to the sacrifice and conservation efforts already made by the anglers who harvest Striped Bass for food.

The RIPCBA would support increasing recreational accountability. The for-hire sector of the recreational fishery should have its own RHL and measures. The for-hire sector should be held accountable to that RHL. Tools currently in place for much of the for-hire fishery, such as eVTR's, could be put in place for the entire for-hire fishery for monitoring the RHL. Separating the private and for- hire Sector RHL's would allow for separate measures specific to the needs of each sector and create a management system with less conflict between users during spec setting processes and allow the smaller for-hire sector to craft management measures aimed at rebuilding the sector which has been hurt by previous management measures.

Under "Other Issues" the RIPCBA would like to suggest priority be given to enforcement of existing Striped Bass management measures. The rampant poaching, well documented each season, is concerning to us and it should be concerning to everyone interested in the best management of Striped Bass. States should be incentivized to hold poachers accountable. RIPCBA members would support research of Striped Bass located in the EEZ to gauge if the stock has transitioned offshore from its traditional waters.

Respectfully Submitted,

Capt. Rick Bellavance

Capt. Rick Bellavance, President
RI Party and Charter Boat Association

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ANGLERS
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March 26, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Comments on Atlantic Striped Bass Amendment 7 Public Information Document (PID)

Dear Ms. Franke and Atlantic Striped Bass Management Board:

The Rhode Island Saltwater Anglers Association (RISAA) represents over 7,500 recreational anglers and 28 affiliate clubs in Rhode Island, Connecticut and Massachusetts. We are pleased to take this opportunity to comment on this PID for Striped Bass, the most important species of fish in our waters, and we commend the Board for aggressively reaching out for public comment at this early stage of development of a new Amendment.

Before we address the specific topics and questions posed in the PID we would like to state our overall comments on this effort:

- First and foremost, we are disappointed at the current state of the striped bass stock especially since we endured tremendous hardship in the 1980s to help rebuild this stock only to see management actions allowing the stock to again decline in the early 2010s.
- We do not believe that this is time to consider lowering the SSB Threshold or Target levels.
- We believe that the reason for the current decline is largely because managers have yielded to political pressures rather than looking out for the best interest of rebuilding fish stocks. This includes far too liberal use of Conservation Equivalency measures and lack of strict enforcement of overfishing by individual states.

Issue 1: Fishery Goals and Objectives:
We believe that the goals as set forth in Amendment 6 are still reasonable to use and that the emphasis should be to meet the SSB Target, not only the Threshold. Based on fishing experience during the early 2000s it seems that the 1995 SSB estimate turns out to be a workable level for stock rebuilding, so there is no reason to change these objectives. We agree with more stability and regulatory consistency but only when the stock has been rebuilt to levels above the SSB Target level. RISAA is not in favor of regulatory flexibility since we believe that such flexibility has contributed to overfishing of striped bass in the past 10 years.

Issue 2. Biological Reference Points:
RISAA is in support of continuing to use the 1995 estimate of female SSB as stated above. We think that the Target level of 125% of the estimated 1995 SSB is still attainable and is still appropriate. We support measures

to support a diverse age structure in the striped bass population. We are concerned that overfishing has occurred in some states that make up the Chesapeake Bay region and this overfishing was never properly cured, leading to a coastwide negative impact. This type of overfishing needs to be addressed and some form of pay-back needs to be assessed if overfishing occurs in any district in the future.

Issue 3. Management Triggers:
RISAA agrees with most of the current management triggers, however we believe that all triggers should be evaluated annually and if any trigger is exceeded the consequences need to be followed strictly and enforced starting the following season. We would also prefer to see rebuilding timelines on a 5-year target rather than a 10-year target so that more strict measures can be implemented in only a 3 to 4-year timeframe if sufficient progress is not being made toward rebuilding. We also believe that Trigger 5, based on recruitment needs to have a higher recruitment threshold and should be reconsidered.

Issue 4. Stock Rebuilding Targets and Schedule:
The fishing mortality-based triggers account for annual variability in fishing mortality and should be evaluated and enforced annually. As can be observed from our other answers above, we believe that rebuilding is the key issue for striped bass at this time and mitigation to fisheries, although important, must not take priority over rebuilding. For that reason, we understand that more significant changes may be necessary to rebuild stocks and only after stocks are rebuilt can managers then move into a management system with more consistent regulations. We also suggest that the Board needs to pass a Rebuilding Plan immediately.

Issue 5. Regional Management:
RISAA urges the Board to make as few changes in management as possible until the coastwide stock is rebuilt. Separate management decisions for the Chesapeake Bay region have resulted in conservation challenges in the past so we are not in favor of consideration of additional areas for separate regional management programs. In fact, we suggest that this idea be removed from further consideration during the planning of Amendment 7.

Issue 6. Management Program Equivalency (Conservation Equivalency):
We believe that fairly liberal application of CE has, in the past, contributed to overfishing in some districts, therefore we are recommending that CE only be considered if striped bass are not overfished and overfishing is not occurring. We understand the idea that some local districts may be able to modify coastwide regulations to better fit their districts, however we urge the Board to limit when CE is accepted and make it clear that the effectiveness of CE must be monitored. Any states that implement CE must be held accountable if their regulations fail to meet the stated conservation objectives.

Issue 7. Recreational Release Mortality:
We recognize that release mortality is a problem in the recreational fishery for striped bass. All actions that have the potential to reduce release mortality should be considered, however we believe that the Board needs to focus on a meaningful education effort to provide anglers with the information that they need to reduce release mortality. This educational effort can be conducted with the help of State regulators and local fishing organizations. This education can take a wide range of options, including a possible requirement that anglers watch an instructional video and pass a short quiz before they obtain a recreational fishing license (similar to the current requirement for shark fishers).

Since we agree that all options should be on the table we think that banning of treble hooks and gaffing should be part of the range of considerations for the Board. Other options such as the use of barbless hooks should also be considered. We remain skeptical about the precision of the current estimate of dead discards at 9% of all striped bass released. Since the figure is now generating release mortality figures that are in the same range as

pounds of fish harvested in the recreational sector we urge the Board to conduct additional studies to better estimate actual release mortality for striped bass and to understand the conditions and behaviors that increase mortality. We also would support reducing effort in the recreational fishery to the extent that it can help build stock back to the Target SSB even if that requires some use of closed season.

Issue 8. Recreational Accountability:
RISAA is not opposed to the concept of a Recreational Harvest Limit (RHL), however we fail to see how such an RHL would be measured or enforced. There is no reliable way to determine recreational harvest or dead discards at this time. MRIP data is not a good way to measure total recreational take of striped bass and therefore would not be usable to determine RHL compliance. Based on this we see no way to proceed with RHL at this time.

Issue 9. Coastal Commercial Allocation:
While RISAA is not in a position to directly comment on Commercial Allocation we believe that the health of the striped bass stock is at a critical point right now. For that reason there must be tightening of commercial quotas at this time to coordinate with all of the issues being considered in the recreational fishery. In addition, we ask that the Board consider coordinating recent requirements in the recreational fishery with the commercial fishery. That includes circle hook requirements and harvest size requirements among other issues.
Issue 10. Any other topics that should be addressed in Amendment 7?

RISAA is concerned that there may be issues in addition to fishing that are impacting striped bass populations and we have identified some things that should be prioritized as research initiatives:

- We believe a better understanding of striped bass migration through funding additional satellite tagging programs would be beneficial.
- We also believe that diseases like mycobacteriosis may be impacting striped bass and we would like to see additional studies of the effects of diseases on striped bass.
- RISAA would like to see new studies of recreational release mortality so that the actual mortality may be better understood and conditions or behaviors that cause mortality can be identified.
- Finally, as stated above, we believe the Board must do more to promote education of anglers regarding methods to properly handle striped bass and other species to reduce discard mortality.

Thank you for the opportunity to provide these comments.

Sincerely,



Stephen J. Medeiros
President



Richard C. Hittinger
1st Vice President

Stripers Forever
209 Winn Road
Falmouth, ME 04105
email: stripers@stripersforever.org

April 9, 2021

RE: **Comments on the Atlantic Striped Bass FMP Amendment 7 PID (Public Information Document)**

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
Fax: 703.842.0741
comments@asmfc.org (subject line: Striped Bass PID)

Dear Ms. Franke:

On behalf of our 4000 members and in response to the current state of the Striped Bass stock, overfished with overfishing occurring and now at a 25-year low, Stripers Forever is suggesting a 10-year harvest moratorium for both the commercial and recreational fisheries. A moratorium is the only action that has proven effective in rebuilding the stock. The moratorium would also allow ample time for the commission to collect data, update biological reference points and accurately measure the impact of the commercial and recreational fisheries.

In addition to the moratorium, we would also strongly suggest seasonal closures in areas of prolific spawning. We need to give Striped Bass the chance to stage, spawn and then redisperse along the coast without any human intervention. The will give the SSB the best chance possible to rebuild and provide strong year classes.

Below are our comments on each of the 10 issues presented in the PID.

Issue 1: Goal ("To perpetuate… migratory stocks of striped bass.") is fine.

Objective 4 ("Foster quality and economically viable recreational, for-hire, and commercial fisheries."): remove the commercial reference. Recreational anglers are the overwhelmingly dominant user both in terms of numbers of participants and economic impact. Managing for commercial interests runs counter to the greater public good.

Objective 6 ("Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures."): Gamefish status would solve this.

Issue 2: SF's position is to maintain existing biological reference points (BRPs) since we know that the stock can attain those levels as it has in the past.

Issues 3 & 4: Management triggers & timeline ("Up to ten years."): Keep what is there and follow what they say should happen. Triggers were ignored after implementation in Amendment 6 and that is at least part of why the stocks are where they are today after 18 years of a ten-year plan. For Issue 4, SF's position is to rebuild the stocks, and maintain, sustain abundance, vs. manage for "maximum sustainable yield."

Issue 5: Regional Management is a good idea. Chesapeake Bay is the Striped Bass' primary nursery and should be managed differently than the coastal fishery should be different. In addition, we are strongly recommending the adoption of seasonal closures in spawning locations such as the Hudson River. Striped Bass should be given the opportunity to spawn without human intervention. Closing the Hudson River, Ny Bight and Raritan Bay to Striped Bass Fishing in the spring would protect large females as they migrate from spawning grounds into their coastwide distribution. This is a no brainer, and we believe it will dramatically protect and improve the spawning stock biomass. It won't be easy though, unless you have game fish status.

Issue 6: Conservation Equivalency should be status quo, but with consequences when states adopt CE measures that fail to achieve desired outcomes.

Issue 7: Recreational Release Mortality: The circle hook requirement is fine as implemented in Addendum VI. Treble hook use on artificial lures, and proper handling should be a continuing education process.

Issue 8: Recreational Accountability: Implementing recreational harvest limits (RHLs) will be a problem until the Marine Recreational Information Program (MRIP) is supplying timely and high confidence data.

Issue 9: Coastal Commercial Quota Allocation; The simplest answer is to make it a game fish. End of story. Harvesting juvenile

fish in Chesapeake Bay and larger, breeder-size females along the coast runs counter to achieving management goals.

Issue 10: Other issues: "How would you like management of the Atlantic striped bass fishery to look in the future?" Stripers Forever stands by its mission: Make it a Game Fish.

I addition to the comments above we would also like the commission to strongly consider the following measures.

- Moratorium (coast and bay, no recreational or commercial harvest) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.
- No targeting Striped Bass in traditional spawning areas, as determined by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or
- egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for Striped Bass.

Thank you for your consideration of these comments.

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April 5, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Comments to Amendment 7 Interstate Fishery Management Plan for Atlantic Striped Bass

Dear Ms. Franke:

On behalf of the Stellwagen Bank Charter Boat Association whose membership includes the for hire fleet, recreational anglers and commercial fisherman that fish the state and federal waters off the coast of Massachusetts and abutting states, we offer the following comments to the Atlantic States Marine Fisheries Commission associated with Amendment 7, Interstate Fishery Management Plan for Atlantic Striped Bass.

Issue 1. Fisheries Goals and Objectives

GOAL – The goal includes "*provide for the restoration and maintenance of their essential habitat.*" Detrimental impacts to habitat resulting from changing environmental conditions due to point and non-point discharge of pollutants, increased water temperatures and climatic shift have a significant impact on reproductive yield and year class performance. Such impacts may exceed directed fishing mortality. In an attempt to achieve this goal, proactive measures are recommended to restore and maintain essential habitat.

Objective 2nd Bullet: If one assessed the striped bass biomass from 1982 to 2016 and stock size recruitment, the current biomass falls within a range that should produce an adequate above average recruitment when compared to the 1994 to 1999 time period. Juvenile mortality with below average recruitment during the 2005-2010 and 2012-2014 timelines that appears to be a result of environmental factors and not attributed to fishing.

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Objective 4th Bullet: This objective should include language that the recreational fishery includes consumptive, trophy and catch and release aspects of the fishery. The angler who desires to take a fish home to eat must be considered in the management of this fishery.

Objective 7th Bullet: It appears that a greater portion of the age 15 and older fish are spending more time in areas where directed fisheries are prohibited (EEZ). In addition, fisheries independent surveys that operate in those areas are designed or capture larger striped bass. It has been suggested that a significant portion of these older striped bass are not being intercepted in the survey as historically has occurred the past. If such is correct, then there is a need to adjust fishing mortality targets to accommodate these older fish and drive a greater need to update or refine sampling methods to capture these encounters. We would suggest that ASMFC request that NOAA Fisheries evaluate the outcomes of a directed recreational catch and release fishery for striped bass in the EEZ. The prohibition on the possession of striped bass in the EEZ would be maintained but the catch and release of striped bass in federal waters might capture more information on these larger fish.

Issue 2: Biological Reference Points (BRP)
The current BRP might be outdated. While the fishery may have been rebuilt in 1995 and reached historic high levels of abundance in the mid-2000's under these BRP the fishery has changed in that roughly 20 year period as a result of point and non-point discharge of pollutants, increased water temperatures, climatic shift and predation of striped bass by gray seals and juvenile great white sharks and movement or leakage into Canadian waters. Therefore, using a BRP based on a 1990 stock abundance may not be best approach at the current time. We suggests including a term of reference request for the 2024 benchmark assessment to include an evaluation of the current BRP and if more current time periods may produce more representative BRP's.

With regard to natural mortality, the value of M in the second natural mortality period for both age groups is much higher than the commonly assumed, biological based value of M=.15. While the large inter-period variation and large estimate of M should be viewed with caution, the fact that all of the tagging programs show an increase in M between periods suggest that it is likely M has increased in the stock. This change should be solely applied to natural mortality and not fishing mortality.

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Issue 3: Management Triggers:
There is disconnect between increasing female SSB and recruitment. There is also a higher level of variability with regard to some of the aspects of the fishery used to prompt management responses. We recommend evaluating the current management triggers to assess if management actions imposed on the fisheries are having a positive and measurable impact on the stock. The current recreational measures in this fishery are already highly restrictive, we would caution against triggers that force mandatory regulatory action.

Issue 4: Stock Rebuilding Target and Schedule:
The current stock rebuilding target needs to be reevaluated. Considering that the striped bass stock reached a historic high level of abundance in 2005/2006, it would appear that the rebuilding target may be inappropriate in light of the productivity of the stock and environmental factors that influence reproductive output. Environmental factors must also be considered in setting rebuilding targets such as point and non-point discharge of pollutants, increased water temperatures, climatic shift and predation of striped bass by gray seals and juvenile great white sharks and movement or leakage into Canadian waters.

We do not support a fixed timeframe for rebuilding at this time. Given the uncertainty with regard to how the striped bass stock seems to have a diminishing return in response to management action, selecting a fixed rebuilding time frame sets up a mandate that is doomed to fail at great cost to the industry.

We suggests maintaining a fishing mortality rate that is expected to maintain the stock above the management triggers.

Issue 5: Regional Management
The status of the stock and condition of the Atlantic Striped Bass fishery is widely dictated on a regional basis. However, the data to assess and manage the stock on finer geographic scales is inadequate. We support greater resources being devoted to evaluating the Atlantic Striped bass on a regional scale such that management can be better tailored to the condition of different stocks or areas of the resource.

P.O. Box 1230
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Issue 6: Conservation Equivalency
We support the continued use of conservation equivalent management for striped bass. The conservation equivalent allows states to set measures to accommodate the needs of their particular fisheries.

Issue 7: Recreational Release Mortality
Given the recent analysis that found that modest changes (+/ - 15%) to recreational discard mortality rate had inconsequential impacts on the overall statue of the striped bass stock, coupled with the issues surrounding the circle hook regulation that went into effect January 1, 2021, we request that the circle hook mandate be converted to a voluntary conservation measure until January 1, 2023. This would allow managers to evaluate different techniques and uses of bait with j hooks and allow the industry to design and manufacture a range of circle hooks that accommodate the needs of recreational striped bass fishermen.

Issue 8: Recreational Accountability
We suggests that this section be stricken from the amendment. When a recreational angler follows the regulations set by federal or state regulators that angler is being accountable and nothing further should be expected of that angler. As a whole, the recreational fishing sector is a cross section of the public. The public is allowed to access and partake in recreational fishing without obstruction such as limited entry or other capacity control measures. A goal of fisheries management should be to rebuild and maintain fish stock to the benefit of commercial and recreational fishermen. As this success becomes realized, a positive consequence should be that more recreational anglers enter the fishery. We firmly supports the continuation of allowing the public open access to the striped bass resource. In general, we do not agree with the tone of this section and suggests that it be removed from the document.

In conclusion, it should be noted that Addendum VI, implemented measures to reduce striped bass removals by 18% to achieve fishery management targets for 2020. It is not clear if the 18% reduction in removals has been reduced, achieved or exceeded? As a result we recommend that any significant changes to the existing striped bass fishery management measures await the outcome of the 2022 striped bass stock assessment.

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If you have any questions or comments please email or give me a call.

Very truly yours,

Capt. Mike Pierdinock

Capt. Mike Pierdinock
SBCBA, President
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Capt Rick Golden
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Cc: Dan McKiernan, MassDMF
Ron Amidon, MassF&G

From: The Brooklyn Fisherman
Sent: Tuesday, April 6, 2021 11:05 AM
To: Comments
Cc: stripercomments@gmail.com; WILLIAM HYATT; Sen. Craig A. Miner; ROBERT LAFRANCE; Rep. Melissa Ziobron; Justin Davis; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] Amendment 7 PID Comments

Dear all,

Hi, my name is Arek! I am a high school student from Brooklyn New York and Greenwich Connecticut (divorced parents) speaking on the behalf of the Tightlined Conservation Coalition. For the most part, I fish in Long Island sound, both CT and NY side, and I would personally like striped bass to be managed for abundance. I know I am young but I feel that these issues are very important and need to be talked about. (P.S.To keep things organized I will devote the next nine paragraphs solely to each topic of the PID document.)

To start, the "Fishery Goals and Objectives" should be completely taken out of the amendment. The current goals and objectives are perfectly fine and should not be changed. The ASMFC needs to now go through with their goals instead of just writing them on paper.

The "Biological Reference Points" were a heavy topic in all the hearings. Personally, I think it is scary to even consider lowering the goalposts. If students received A grades for failing tests then I don't think they would end up being too successful. The same idea applies here. Just because the ASMFC has failed to maintain the stocks does not mean the goalpost should be lowered. The problem is properly solved by having the stock meet the original goalpost. Though, I do understand that the goalpost might not be entirely scientifically correct. Even with that in mind, we should always reach for the stars and not take the easy way out. In the long run that will have the most positive effects on the fishery as well as the

economy.

As for “Management Triggers” the ones related to fishing mortality and spawning stock biomass are still appropriate. Though, Trigger Five should certainly be revisited. Just because the juvenile abundance index is lower than 75% for three consecutive years does not necessarily mean a failure due to striped bass spawning being so unpredictable.

“Stock Rebuilding Targets and Schedule” is a crucial part of this amendment because that is what is trying to be accomplished. Therefore a rebuilding plan should be initiated as fast as possible. By now there should have already been a plan in place but that has not happened. Please stick to your word and get that done. The longer you wait the worse the problem becomes. As for the timeline of this plan, ten years follow the Magnuson-Stevens Act for a sustainable fishery and striped bass are rather slow to mature so a larger timeline makes sense.

“Regional Management” was another heavy topic during the meetings. There is a large mix of ideas because the fishery varies up and down the coast. As great as it would be to manage striped bass regionally there is not enough data right now to make an educated decision. Until then the stock should be managed as a whole. Therefore this topic should be removed from the amendment entirely.

On the topic of regional management “Conservation Equivalency” should be removed. It might be helpful in the future once the stock is not overfished or experiencing overfishing but until then it should not even be considered. If it does get implemented then states must be held accountable for failing to meet the stated conservation objectives. If states are allowed to get away with murder and are not held accountable for their actions then the stock will continue to decline.

As stated earlier, it is premature to implement certain topics because the data is not yet available. The same applies to “Recreational Release Mortality”. The Massachusetts Division of Marine Fisheries is in the process of studying the impacts of catch and release mortality as well as the impact of certain fishing methods. Given

that there is no solid evidence changes should not be made. Though, it is extremely important to continue teaching because 90% of the recreational striped bass fishery consists of catch and release fishing so people must have the right knowledge. It seems that education is under control with The Fisherman and On the Water Magazine continuously putting up videos and articles about this but more education doesn't hurt.

Another issue that is a little too broad to concur is "Recreational Accountability". Since it encompasses all recreational species under the ASMFC it is a much larger issue that shouldn't try to be solved in this amendment. It should be its own thing and should not be involved in this amendment process.

For topic ten "Commercial Allocation" the landing periods should probably be updated. They are fifty years old and the commercial fishery has changed a lot since then. Now the majority of the fishery is recreational as well as catch and release.

Finally, I would like to say that I would love to catch striped bass for the rest of my life and to hopefully watch my kids catch them. The direction the stock is going in now is not great but it can be easily solved before it gets any worse. To do that these changes to the amendment must be made especially since a large group of the stock is about to enter the slot limit. Topics like teaching about proper catch and release methods and the use of circle hooks are all great tools to help with this. In the long run, a healthier fishery and economy are made through conservation. If morality can't move mountains then hopefully money can. I really hope you all listen and make these changes because so far the ASMFC has had a pretty bad track record with managing other species and it would be terrible to see the same happen to striped bass. Based on your website most of the species you manage are either overfished or depleted. For example, weakfish are depleted, winter flounder are overfished, and bluefish are overfished as well. This is seriously disappointing and should not be allowed to continue. I (a young teenager) should not have to be here

demanding change, this is your job, but it has come to that which is truly scary.

Thank you for your time!

- Arek Zenel - Walasek

The Nature Conservancy
Protecting nature. Preserving life.

April 7, 2021

Emilie Franke, FMP Coordinator
Atlantic States Marine Fisheries
Commission 1050 North Highland Street,
Suite 200A-N Arlington, VA 22201
(submitted via email: comments@asmfc.org)

Re: Striped Bass Public Information Document leading to Amendment 7

Dear Commissioners and Commission Staff:

The Nature Conservancy appreciates the opportunity to provide comments on the Public Information Document for Amendment 7 to the Striped Bass Fishery Management Plan.

The Nature Conservancy has chapters in all U.S. coastal states, and our marine conservation objectives prioritize healthy and resilient ocean ecosystems, sustainable seafood and strong coastal communities. We are committed to working with stakeholders and managers to create and maintain the conditions necessary for achieving these marine conservation priorities.

Two decades ago, striped bass management was considered a national success story. Managers and stakeholders widely celebrated the successful rebuilding of the striped bass population, and in the years that followed the striped bass fishery took its place as the premier inshore sport fishery in many East coast states.

Unfortunately, the dedication and commitment it took to rebuild the striped bass population were not maintained. Consequently, the striped bass population and the quality of the fisheries it supports has been declining. The fact that problems with this fishery have manifested for over a decade, that measures to effectively curtail fishing mortality were not taken much sooner, that a rebuilding plan of ten years or less has not yet been adopted, and that state conservation equivalency provisions have repeatedly been used in ways that appear counter to what is needed to assess and achieve coast-wide fishing mortality and biomass goals have collectively been eroding stakeholder confidence in the ability of the Atlantic States Marine Fisheries Commission to accomplish the intended long-term objectives for striped bass, and several of the other fisheries managed by the Commission. In addition to harmful social, ecological, and economic consequences that follow failure to achieve fishery management plan objectives, erosion of confidence in the Commission management process has confounding ramifications for voluntary compliance among states and individual fishermen that are essential hallmarks for all fishery management programs.

Amendment 7 to the striped bass fishery management plan has been proposed amid the backdrop described above. How this amendment develops and is ultimately approved and implemented has the potential to rebuild the striped bass population while restoring confidence in the Commission management process. Alternatively, it could do the opposite. We strongly urge the Striped Bass Management Board to reflect on the past decisions that have led to the circumstances that this resource, this fishery, and the Commission as an institution are in at this juncture. **Amendment 7 should focus on a strong rebuilding plan, including thorough analysis of the impact of regulatory options on the trajectory of the stock.** Within that context, below is our feedback on the ten questions posed in the Public Information Document.

Issue 1: Goals and Objectives

Public comments we have heard so far concerning this PID, as well as comments we heard and read during the previous Addendum process clearly show that a vast number of stakeholders want to see striped bass managed for abundance that meets societal goals for a robust fishery throughout the range of striped bass. These objectives are well synchronized with objectives aimed at maintaining a robust spawning stock characterized by a broad size structure that should add resilience and hedge bets against any one segment of the coast-wide spawning stock or survival of new recruits being less successful in any given year. This is also consistent with goals for setting up the striped bass population, and by extension the striped bass fishery, to be more resilient to interannual variability in weather, precipitation, and oceanic conditions in light of changes we are anticipating because of climate change.

We do not believe that the board should lower the bar that it has already set for managing striped bass but should instead look more carefully at the intent of these goals and objectives when making management decisions. It should be recognized that there is a potential conflict between the goal of "minimizing or eliminat(ing) the need to make annual changes and modifications to management" and the goal to "maintain stock size at or above the target female spawning stock biomass level and a level of fishing mortality at or below the target exploitation rate." The latter goal should take president to the former. Achieving both simultaneously is possible, but to do so the board must prioritize taking a more precautionary approach when setting specifications. In particular, specifications should be set such that they have a high probability of achieving their intended F rate and biomass levels. If managers decide to choose specifications that have a 50% or less chance of achieving their intended goals, which is a risky way to manage, then there is a higher chance of latter objective getting violated, which then calls for management adjustments. And in the absence of making those adjustments proactively and sufficiently when problems are first noticed, there is greater chance of failing to meet management targets year after year. This scenario becomes increasingly problematic because it worsens the conditions of the fishery and then ultimately requires more drastic (and more contentiously debated) management changes.

The solution to this conundrum is to set specifications that have a high probability of success. Managing in this manner would <u>not</u> require any changes to the current goals and objectives, it would simply require managers take a management posture that more closely prioritizes achieving these goals and objectives.

Issue 2: Biological Reference Points

We are not aware of analysis showing the current reference points are unattainable. The most recent stock assessment indicated that past fishing mortality (1995-2017) was above the target, even as SSB was at high levels. If fishing mortality were constrained to targets levels, perhaps the SSB targets would have been achieved. Given the strong stakeholder desire we have consistently heard for maintaining high abundance of striped bass to support societal concerns, combined with additional uncertainties around potential impacts of climate change for many prey and predator species in this region, we would not recommend selecting lower biological reference points or changing the 25% buffer at this time. Stakeholder desire for managing for abundance and robust population size structure is consistent with goals for sustainability and consistent with the concept of incorporating resilience to climate change. **We recommend maintaining the current Biological Reference Points and removing this issue from further consideration in Amendment 7.**

We support the Technical Committee's continued work on a two-stock SCAA model to inform consideration of model-based reference points in the future.

Issue 3: Management Triggers

We recommend maintaining management triggers 1-4 as is. Management trigger 5 specifically focuses on juvenile abundance indices. These indices represent a significant investment for the states that do them, and they provide an early and valuable population abundance forecast that managers of most other fisheries should be envious of. However, we believe that trigger 5 could be modified to use these early forecasts more effectively in the management process. While we recognize that year class strength estimates based on any single year's recruitment index may not warrant an automatic management change trigger, as written the current triggers requirement of three consecutive years being 75% below average may be too rigid. While we are not recommending specific language replacement, we do believe that the Board should review and discuss trends in juvenile abundance indices and determine appropriate management action every year. Having a trigger based on juvenile abundances is a good and important plan provision. But there may also be ways to more fully utilize the juvenile abundance indices to trigger management actions earlier when a small or modest action has the potential to stave off the need for a larger one down the road.

The Striped Bass Technical Committee are likely in a stronger position to suggest specific language on this and thus our recommendation is to task them to present alternatives for ways to best utilize these important year-class abundance forecasts as a proactive management tool by presenting one or more alternatives to the current language of trigger 5.

Issue 4: Stock Rebuilding Target and Schedule

We recommend that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan be specified and incorporated as part of Amendment 7. This is important for increasing confidence and certainty for commercial and recreational fishing businesses and will also increase clarity for the technical assessment team tasked with keeping track of progress in measuring stock and fishery performance in achieving plan objectives.

Issue 5: Regional Management

Ideally, striped bass would be managed at the individual stock level, when the science is mature enough to support management at that scale. We support the work of the Technical Committee toward the development of a two-stock model and additional science to further elucidate stock structure and traditional spawning grounds along the coast. However, now is not the time to initiate a major change to an alternative regional management approach (plagued by additional uncertainty) at a time when the stock is overfished and the priority should be placed on adopting and implementing a rebuilding plan.

Issue 6: Management Program Equivalency (Conservation Equivalency)

The provision for allowing for conservation equivalency (CE) proposals has some value in the menu of options available to ASMFC management boards, but the way CE has recently been applied by the Striped Bass Management Board may be causing more problems than it has been solving.

In many instances the information necessary for forecasting equivalency is simply not precise or accurate enough, yet state delegations are pressured by some segments of the fishing industry into proposing them, state assessment teams feel compelled to advocate for them, and managers who strive to work collaboratively with their neighboring states feel compelled to approve them. When divergent measures are put forward by different states, they can easily serve to undermine one another, and it becomes virtually impossible for assessment scientists to retroactively determine which ones met their goals and which ones failed. Ultimately for striped bass, everyone pays the price when a CE proposal fails to achieve the overarching plan goals while managers who make these proposals are not adequately held accountable.

Given the early population forecasts that are available to striped bass managers via the juvenile survey indices, using size limits and/or slot sizes aimed at protecting either strong or weak cohorts is a viable management tool. However, this tool becomes much less effective if different states put forward alternative maximum size limits or slot sizes as was done just recently in Addendum VI to Amendment 6 to the Striped Bass FMP.

Taken to its extreme, CE provisions can be abused to the point of losing sight of coast-wide management objectives and the value of managing migratory fish stocks in a cohesive and effective way. The way CE provisions have been applied in the striped bass fishery, including the timing of CE proposal presentations sequenced after soliciting extensive public comments on consistent coast-wide measures, is a major contributor to the erosion of stakeholder confidence in the efficacy of ASMFC as a management body and has served to pit states against each other, particularly where adjacent states share the same fishing areas.

We recommend that as part of Amendment 7 the ASMFC Striped Bass Management Board specifically outline constraints on the use of the CE provisions beyond what is outlined in the policy and technical guidance document, particularly while the resource is overfished or experiencing overfishing. We also recommend that in order to receive approval for CE proposals, states should have to show that their CE proposal does not erode conservation actions taken by states that are implementing the original plan proposal. States CE proposals should be required to include technical committee approved

actionable methods that they will take to retroactively show that their provision did in fact achieve the equivalence of the intended objectives of the original proposal, and states should assume reasonable accountability for exceedances if they are shown to have occurred.

Issue 7: Recreational Release Mortality

Post release mortality is part of every commercial and recreational fishery. Fisheries that are dominated by catch and release such as the Florida tarpon fishery have more fish die from post-release mortality than from direct take. Thus, the post-release mortality numbers presented in the resent assessment should not be terribly surprising. Regardless, most fishermen would prefer that fish they release survive. Thus, we believe that progress can, overtime, be made to reduce post-release mortality through better education and outreach on the range of conditions that contribute to higher, or lower survival of released fish. The Commission, member states, and stakeholders such as fishing guides, fishing media, fishing clubs, tackle shops etc. can all contribute to disseminating and promoting information and practices that can increase post-release survival of striped bass. Mandating circle hooks for bait fishing is appropriate, but ultimately angler behaviors to reduce post-release mortality will, by necessity, be voluntary. But for voluntary actions to spread through either targeted information sharing and/or peer – to peer interactions, there needs to be accurate and concise informational material developed that explains where, when, and how. The Commission could play a role in developing communications materials that states could then target to anglers.

Any quantitative proposals for seasonal area closures aimed at reducing post-release mortality by reducing fishing effort would need to be informed by spatially and seasonally specific post-release morality estimates and temporally/spatially specific effort estimates to forecast the conservation benefits. Information at that resolution is likely not currently available, but if it is, and if that modeling exercise was done, we believe the results of it could provide a potentially effective communication tool to spur voluntary behavior changes before any regulatory action like that would require being called for. Seasonal area closures aimed at discouraging the targeting of reproductive fish as they swim the final stretch to known spawning areas, and/or while they are spawning, is a topic worthy of further consideration.

Issue 8: Recreational Accountability

The Board should consider a Recreational Harvest Limit (RHL), whether as part of the rebuilding plan or in a future action. The federal system requires an RHL and the rigor of that system has helped rebuild many fisheries successfully. However, one need only look at the jointly managed species such as black sea bass to see that setting an RHL will not magically solve overage problems. The Board must take a hard look at how a celebrated population recovery has regressed to an overfished status—you might call it management accountability. Managers must assess what brought us to the current situation and address those problems at the root. Management must evaluate whether the regulations being set are achieving the desired conservation outcomes.

Issue 9: Commercial Allocation

A healthy rebuilt striped bass population should be able to support both a recreational and commercial fishery. It may very well be that the 1970's base period for setting commercial and recreational allocations is out of date, and we recognize that at some point we need to look

forward and make determinations based on societal preferences of what we collectively want to get out of the striped bass resource. However, allocation will take much time and debate and therefore should not be part of Amendment 7 which should focus on adoption and implementation of a rebuilding schedule.

In closing, we are heartened by the number of striped bass fishermen and trade interests that have come out in support of rebuilding the striped bass population and maintaining levels of abundance that have been shown to have socio-economic benefits to coastal communities throughout the range of the striped bass population. We encourage the Commission to take necessary actions to rebuild the striped bass population to achieve the SSB target within ten years, and to use this experience to re-evaluate how the Commission's structure and function allowed its flagship fishery to be overfished for 11 out of the last 13 years. Lessons learned through this reflection process could then be applied to avoid repeating overharvest scenarios in other fisheries managed by ASMFC or jointly with the federal fishery management councils.

Thank you for considering these comments and as always please reach out if you have questions or there is anything that we can do to contribute to the Commission's success in achieving sustainable fisheries on the Atlantic coast.

Sincerely,

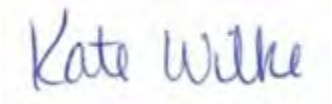
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April 9, 2021

Attention: Emilie Frank, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission (sent by email)
RE: Atlantic Striped Bass PID

VAC Comment Letter to ASMFC on the Atlantic Striped Bass PID

On behalf of the 102 members of the Virginia Anglers Club (www.VirginiaAnglersClub.org), I wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment 7 Public Information Document (PID). The current striped bass population decline is of serious concern to us, and ensuring quick restoration of their population should be the primary objective of the ASMFC throughout the Amendment 7 process and into the future. Our club is a proud member of the Virginia Saltwater Sportfishermen's Association. Capt. John Page Williams, our Conservation/Legislation Vice-President, serves on VSSA's Board and participated in development of the Association's extensive comments. We support all of them heartily. In addition, we wish to emphasize several points in the PID.

1. Fishery Goals and Objectives
Fishery goals and objectives are a critical part of the fishery management plan that set the context for what the remainder of the plan seeks to achieve. Current goals and objectives in the striped bass fishery reflect the collective desire of anglers, commercial fishermen, and managers to support fisheries while maintaining a precautionary approach to management in response to prior experience with the striped bass moratorium. The objective to manage the striped bass stock to the target is a critical management objective that should be the default for all fishery management plans. Given the current status of the stock, management flexibility and stability should take a back seat to other issues until the stock is closer to its target population.

2. Biological Reference Points
Biological reference points are the tool by which managers implement the plan's goals and objectives. It is critical that the biological reference points reflect the values of stakeholders and the guiding principles set out in the goals and objectives. The current biomass target (125% of 1995 biomass) and threshold (1995 biomass) represent a time period in which the stock was considered rebuilt and exhibited stock characteristics that support the FMP goals and objectives. Given that explanation, there is no rationale for altering the biological reference points that serve

as managers' guidance to achieving the fishery characteristics that are most important to the users and the striped bass population. Although some people have raised arguments about the ability of the striped bass population to meet the target, you must first consider that managers have not been able to achieve the target catch rate. Knowing this, ASMFC should focus on more appropriately managing fishing mortality to target rates over the long-term in order to meet the current biomass reference points.

6. Management Program Equivalency (Conservation Equivalency)
Now is the time to reconsider the widespread use of conservation equivalency in the management of the striped bass fishery. Unfortunately, poorly planned conservation equivalency proposals have all too often resulted in less than intended conservation benefit, with few consequences for the managers who have developed them. This lack of accountability has left the biological condition of the stock in worse shape that it should have been. When the striped bass stock is in poor condition, ASMFC should prohibit the use of conservation equivalency. Until the Technical Committee considers MRIP to reflect an accurate estimate of recreational harvest, managers should never use those data to evaluate or justify conservation equivalency.

7. Recreational Release Mortality
Reducing release mortality of striped bass is one of the easiest ways that anglers can help positively influence the current status of the population. ASMFC should be looking at an "all of the above" strategy, including seasonal closures, additional gear restrictions, and angler education opportunities in order to reduce release mortality in the recreational fishery. We recognize that there are release mortality studies underway in Massachusetts, and we look forward to seeing their results, but there is already a solid body of knowledge about good release practices available for dissemination around the Chesapeake Bay. We all should look for tangible opportunities to spread it, and the members of the Virginia Anglers Club will gladly participate in such a program to disseminate it to the fishing public.

10. Any other issues concerning the management of Atlantic striped bass
Striped bass habitat issues are also critical to restoration of the stocks. Addressing additional external factors that increase mortality will also be critical to striped bass recovery. Climate change, water pollution, loss of spawning habitat, reduced forage fish abundance, and invasive species all pose significant threats to striped bass recovery. Draft Amendment 7 should explore all of these topics.

Thank you for consideration of these comments and for allowing me to participate in the PID process. We look forward to participating in the rest of the Amendment 7 development process as it unfolds.

Very truly yours,

Capt. Mike Ostrander

Capt. Mike Ostrander
President
Virginia Anglers Club
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March 31, 2021
Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Re: Striped Bass PID

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board,

On behalf of the entire Virginia Saltwater Sportfishing Assn. (VSSA) membership, thank you for the opportunity to comment on Amendment 7 for the Striped Bass Fishery Management Plan. The issues raised and information presented in this PID are large and more complex than the average person can comprehend. In an attempt to simplify, VSSA maintains there are only two questions. first, what do we want the fishery to be, and second how will we get there. Issues 1. (Goals & Objectives), 2. (Biological Reference Points), 3. (Management Triggers) all relate to what we want the fishery to be. All of the remaining issues outlined in the PID, deal with how to get there.

Recreational and Commercial fisherman alike want the fishery to return to what we had in the early 2000's with an abundantly large population consisting of a diverse age distribution. The only way to get there is to reduce mortality, that is to kill less fish, and the only way to do that is by a reduction in the size, seasons, and/or harvest (bag) limits.

In the following, VSSA will comment on each issue individually. Our comments will return to the themes, "we want a large healthy diverse population:" and we need to "kill fewer fish" (reduce mortality)." The previous Striped Bass recovery provides a much-needed success story for a recovered fishery. Striped Bass recovered once before, and it can recover again, if we take the necessary, bold, and unpopular actions now. Mortality must be reduced sooner rather than later.

Issue 1. The current goal and objectives of the Atlantic Striped Bass FMP: VSSA believes the Goal and objectives set forth in Amendment 6 still apply and should remain for Amendment 7.

The results of the 2018 benchmark are clear, the Atlantic striped bass stock is overfished and overfishing is occurring. Female SSB is below the threshold and has been since 2013. Female SSB peaked in the years 2003-2010. Unfortunately, it has been declining since then. Fishing Mortality has been increasing since 1987 and skyrocketed in 1995. Mortality has remained consistently above the target since then. There is no science to justify any changes to the Goal or any objectives of the current plan.

The stock needs to be rebuilt and Mortality has to be reduced. There is no science or data to support, warrant, or justify changing the goal or any of the objectives contained in Amendment 6. The existing goal and objectives should be retained.

Issue 2. Biological reference points (BRPs): Recreational and Commercial fisherman alike want an abundant fishery. That means healthy population with a well stratified stock of age and size fish throughout the population. The 1995 estimate of Spawning Stock Biomass (SSB) is still valid. SSB was above the threshold for several years beginning in 2003. Some will argue we have never reached the target SSB. Just because we haven't reached it doesn't mean we can't. There is no science to support or justify changing any of the reference points. Any changes to the BRP's for Striped Bass may adversely impact and/or jeopardize the recent work and historic actions on Ecological Reference Points (ERP's) for Atlantic Menhaden.]

As additional information page 7 of the PID contains a statement that reads: *"the current reference points may be unattainable given the current objectives for fishery performance."* There is no evidence or science to support this statement. The BRP's were developed at a time the stock was healthy and we need to return the stock to those levels. VSSA strongly believes not reaching the reference points would be the absolute wrong reason to change reference points. The Striped Bass reference points should remain where they are until the total population stabilizes over an extended period of time.

Issue 3. Management Triggers: The Atlantic States Marine Fisheries Committee's Atlantic Striped Bass Management Board number 1 priority should be to maintaining the long-term health and sustainability of the striped bass fishery. The decline in the Spawning Stock Biomass has to be stopped and fishing mortality reduced. Continued Overfishing will never return the stock to healthy levels.

The triggers in the current plan address three different issues: Spawning Stock Biomass, fishing mortality, and the recruitment. VSSA believes fishing mortality is the most important of the three, because fishing mortality is directly related to maintaining the spawning stock biomass at acceptable levels. In reality, the Board has minimal control over recruitment, but we believe that measures such as restricting commercial harvest in critical nurseries such as the Chesapeake Bay region during the peak spawning period of Feb/March could aid recruitment. Fishing mortality is the only one of the three issues the Board can easily control. The Atlantic Striped Bass Management Board should have never allowed "overfishing" to occur. VSSA believes Triggers 1 through 4 should remain as is and Trigger 5 - juvenile abundance index (JAI) should be modified to reflect a rolling 3-year average vs. 3 consecutive years and requiring action.

Issue 4 Stock Rebuilding and Time Frame: The trigger on overfishing was breached in 2014 with no action on rebuilding the stock. Delaying action may satisfy the boards desire for "Management Stability" but it does nothing to rebuild the stock or reduce mortality. Management Stability does nothing to

rebuild the stock and should be set aside to the immediate response required for the "overfishing trigger". The board needs to act sooner and put corrective measures in place more rapidly (i.e., take effect in the next year). Rather than the 10-year plan outlined in Amendment 6 that has been ignored, VSSA wants to see a 5–7-year rebuilding plan.

Issue 5 Regional Management: VSSA believes, the regional management should be maintained for the Chesapeake Bay and Ocean Regions, but VSSA also believes there is a major equity issue relative to harvest and Fishing Mortality among the states. **Maryland alone is responsible for an average of 41.86% of the total east coast recreational harvest,** dwarfing Virginia's 3.41% (Source: pg. 15, Addendum VI to Amen 6 for Atl. Str. Bass. ISMFP Oct 30, 2019 using the 2016-2019 3 yr. avg.). **Maryland alone is also responsible for more recreational dead releases than any other state averaging 32.74%** of the entire east coast (Source: pg.28, 2016 Atlantic Striped Bass Stock Assessment Update – Technical Committee Memo to Atlantic Striped Bass Management Board, using 2013-2015 3 yr. average). This cannot continue and needs to be addressed.

Given Maryland, Virginia, and the Potomac River Fisheries Commission all manage some portion of the Chesapeake Bay region, and that one can traverse from one jurisdiction to another in minutes, VSSA believes there is a need for more similarity in the jurisdictional regulations pertaining to size, season, and bag limits for Striped Bass. Virginia has taken the lead in conservative actions and the other jurisdiction's need to follow. Stock-specific reference points have already been identified as a research priority, and tools have been identified that may be used to pursue potential alternate approaches in regional management.

Issue 6 Conservation Equivalency (CE): Conservation Equivalency (CE) has turned into a free for all, and just another way for a state to get more fish. There are 15 states. yet in the last addendum, there were over thirty-five (35) CE proposals. VSSA strongly recommends the existing guidelines be modified to restrict the number of CE proposals to a maximum of one per state and no CE allowed when the fishery is overfished or overfishing is occurring. Additionally, any approved CE measure must have a method to quantify results. Actual results that do not deliver the projected results should require immediate corrective action in the following year. Those corrective measures may result in further reductions to size, seasons, or bag limits. The Marine Recreational Information Program (MRIP) data is so imprecise, that under no circumstances should MRIP data be used to evaluate Conservation Equivalency.

Issue 7. Recreational releases...and released alive: VSSA agrees release mortality is far too high with recent numbers exceeding 2 Million fish annually. We agree that circle hooks should be required when bait fishing and may help reduce this number, but further action is necessary. Since we know release mortality is much higher in warm summer months, VSSA believe fishing should be more heavily restricted during these times. We are aware that the charter business could be particularly impacted by such

restrictions, especially in the mid-Atlantic where water temperatures can become very high. The Board should develop a plan to reduce this type of fishing by at least half, perhaps only allowing fishing on odd or even days during periods of peak warm weather/water. While limiting throw backs to a certain number per day would help, we don't believe this is an enforceable practice. **Starting is 2011, Maryland has had more dead discards than any other state.** Maryland's dead releases have grown larger in each subsequent year. In the three-year average of the years 2013 -2015 **Maryland's dead discards were six and one half (6 ½) times the number in Virginia**. (Source: pg.28, 2016 Atlantic Striped Bass Stock Assessment Update – Technical Committee Memo to Atlantic Striped Bass Management Board). **This is unacceptable in light of the current overfished status and should not be allowed to continue.**

Issue 8. Recreational Accountability: VSSA is cognizant the commercial sector, with hard quotas, is far more accountable for its share of striped bass fishing mortality than the recreational sector. VSSA believes improving recreational accountability is critical to ensure the long-term vitality of the striped bass fishery. The current recreational data collection efforts such as the Marine Recreational Information Program (MRIP) are still imprecise and not suitable for in-season monitoring. While a Recreational Harvest Limit (RHL) would in theory be an ideal way to promote such accountability, we are aware of the challenges inherent in this system as well. The Mid-Atlantic Fishery Management Council is currently addressing this issue through its Recreational Reform Initiative, in partnership with ASMFC. The issue of recreational accountability is a complex challenge that applies not only to striped bass but also to all recreational species under the jurisdiction of the ASMFC. We at VSSA applaud ASMFC's participation in this reform initiative and pledge to keep informed on it, participating whenever possible in its deliberations.

Recreational Accountability is extremely difficult and so complex, VSSA recommends delaying action to a subsequent addendum.

Issue 9. Coastal Commercial Quota Allocation

VSSA agrees continuing to use 1972 – 1979 landings as a baseline for commercial harvest is no longer appropriate. Beyond that, VSSA believes Striped Bass Management Board and Technical Committee have more work to do than can be effectively and appropriately be handled in Amendment 7. Accordingly, we recommend postponing action on the Commercial Quota Allocation to a subsequent addendum.

Issue 10. Other Issues

VSSA believes additional research is needed on migratory patterns and proportion of male and female fish in the total population. Such research may include a Chesapeake Bay–wide tagging study to shed additional light on migratory patterns and proportions of male and female fish. It appears that only large fish are migratory and therefore the bay stock may need more restrictive management measures than have been employed to date.

VSSA believes the industrial harvest of Menhaden in the Virginia Chesapeake Bay is detrimental to the Chesapeake Bay striped bass population. Studies have shown the striped bass diet in the bay consists of up to 40% menhaden. We also know that with the exception of 2019, Industrial Bay menhaden fishery has not reached their bay harvest quota in many years. This alone suggests localized depletion of this critical forage fish. Furthermore, the ecological modeling work of Dr. Andre Buchheister, and the recent adoption of ERP's by ASMFC clearly indicates the importance of Menhaden to striped bass. We strongly believe that conservation is imperative and the menhaden "bay cap" should be reduced by 10% consistent with the recent menhaden TAC reduction. Furthermore, research is needed to better understand Menhaden dynamics in the bay and whether further reduction of the menhaden "bay cap", or a total moratorium, is necessary to support our ailing striped bass in the Chesapeake Bay. We should note that the economic impact of striped bass, estimated at over $100 million per year in Virginia alone (down from $200 million in 2010), far exceeds the economic impact of industrial netting of Menhaden in the bay. With current regulations, the industrial harvest of menhaden in the bay is approximately 30% of the total allowable catch along the entire Atlantic coast. This is too high.

Finally, recruitment in the Chesapeake Bay has been poor to just average for many recent years. VSSA believes the practice of commercial netting of striped bass in the Chesapeake Bay during the peak spawning season of February and March must stop. This practice reduces the spawn and likely results in killing thousands of fish that otherwise would have helped with recruitment. While many of the larger fish are not actually caught in a gill net, the heavy presence of nets is likely to disturb the spawn and reduce recruitment. Given the overfished status of striped bass this practice must stop. Commercial netting should only occur after the critical spawning period.

To summarize, VSSA believes the current goal and objectives as outlined in Amendment 6 as well as current Management Triggers remain applicable today and should not be changed. What must change is Mortality must be reduced, the use of Conservation Equivalency modified, and the Striped Bass Management Board needs to react more quickly when triggers are achieved. We believe the issues of Regional Management, Recreational Releases, Recreational Accountability, and Commercial Quota Allocation would be more appropriately and effectively handled in subsequent actions or addendums.

This iconic fishery recovered once and it can recover again. Thank you for considering our comments.

Respectively,

John Bello

Chairman – Government Affairs

CC: Steven G. Bowman, Commissioner
Senator Monty Mason
Mr. J. Bryan Plumlee
Matt Strickler, Secretary of Natural Resources

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April 9, 2021

[Via email to comments@asmfc.org]

Atlantic Striped Bass Management Board
ATTN: Emilie Franke, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland St, Ste. 200A-N
Arlington, VA 22201

Re: Striped Bass PID

Dear Ms. Franke and Members of the Board:

The Twin Rivers Waterman's Association and the Virginia Waterman's Association (collectively, the "Watermen") represent the interests of commercial fishermen who fish in the Chesapeake Bay in Virginia. As counsel to the Watermen, I would like to offer the following comments regarding the Public Information Document for Amendment 7 to the Interstate Fisheries Management Plan for Atlantic Striped Bass ("PID") that was issued in February 2021.

ISSUE 1: Fishery Goals and Objectives

To begin, the current goal of the Atlantic Striped Bass FMP, as set forth in Amendment 6, is well stated and provides what should continue to be the goal of Amendment 7:

> To perpetuate, through cooperative interstate fishery management, migratory stocks of striped bass; to allow commercial and recreational fisheries consistent with the long term maintenance of a broad age structure, a self-sustaining spawning stock; and also to provide for the restoration and maintenance of their essential habitat.

However, as reflected in the PID (p. 5) and emphasized during the Work Group meetings preceding the issuance of the PID, the focus of the process has not been on achieving that goal, but rather on implementing certain "guiding themes" for future striped bass management, namely "management stability, flexibility and regulatory consistency." In developing its Draft

Amendment 7, however, the Board should keep in mind that these themes are not themselves the goal, and that they should only be implemented to the extent they serve the goal. That goal, stated somewhat differently but consistent with its statement in Amendment 6, should be both achieving a robust and sustainable Atlantic Striped Bass population, and supporting both the commercial and recreational fishing communities throughout the regions served by the Commission. Those goals are one and the same because the fishing communities necessarily rely upon having a healthy fishery.

The several guiding themes should only be employed to the extent that they serve this goal. They are means to that end, rather than ends in themselves. For this reason, the guiding theme of flexibility is by far the most important. Differences among the regions result in different problems and require different solutions. Producer areas, such as the Chesapeake Bay, cannot be managed effectively and fairly if subjected to one-size-fits-all regulation in the name of management stability and regulatory consistency. Likewise, neither the commercial nor the recreational fishing communities are well served by regulations that pretend they are one and the same and that ignore the significant differences in the problems they face and the solutions they need.

In preparing Draft Amendment 7, the Watermen hope the Board will focus on the fishery and the fishing communities, rather than any perceived need to create a monolithic regulatory process.

ISSUE 2: Biological Reference Points

As the PID notes, the current biological reference points ("BRPs") for striped bass are coastwide (p. 5), and "the Board has expressed interest in establishing separate reference points for the primary stocks that contribute to the coastwide migratory population, but the current SCAA model does not allow for this" (p. 9). Although the two-stock SCAA model that is under development has the potential to produce a set of reference points for the Chesapeake Bay stock and for the ocean region, the PID states that "this remains a long-term objective" (p. 9).

One of the questions posed (p. 10) is whether the Board should prioritize development of model-based reference points and/or stock specific reference points for the Chesapeake Bay and other stock components. To the extent that doing so would support a regional approach to management, as discussed below, the Watermen believe the Board should do so.

ISSUE 3: Management Triggers
ISSUE 4: Stock Rebuilding Target and Schedule

The Watermen do not have comments to offer on these issues at this time, except to say that such triggers, targets and schedules should be flexible in order to accommodate regional management.

ISSUE 5: Regional Management

The PID begins its discussion of the issue of regional management by acknowledging that although the striped bass population is "actually comprised of several stocks each with unique contributions to the coastwide population," it is currently assessed and managed on a coastwide basis (p. 12). The PID also reflects that previous striped bass management programs have managed specific regions of the fishery differently, and that the fishery has only been subject to one-size-fits-all regulation since Addendum IV to Amendment 6 was implemented in 2015 (Id.).

The current management regime's inflexibility and its failure to address significant differences among the regions, and especially between the Chesapeake Bay and the ocean fishery, not only result in ineffective and unfair regulation but frustrate what should be the Commission's primary goal of promoting the health of the striped bass population and supporting the fishing communities. As the PID recognizes, "there are tools available now that the Board could use to pursue different management programs for the Chesapeake Bay and ocean regions" (p.13). To the extent that doing so "is ultimately a policy decision," it is time for the Board to do the responsible thing and make that policy decision. The necessary allocation of fishing mortality between the regions, as well as other regional management decisions, should then be made in a manner designed to serve the end goal of promoting the health of the fishery in a way that addresses the responsibilities of the different regions and constituencies effectively and fairly.

ISSUE 6: Conservation Equivalency

Right now, conservation equivalencies are the only means available to address regional differences both in the fishery and among the fishing communities. The PID notes that "the primary motivation for more recent CE programs has been for states to propose alternative measures to ameliorate social and economic impacts of actions to reduce harvest." These are worthy and necessary purposes. It is important to retain this essential tool, especially so long as effective regional management remains elusive. Moreover, the availability and scope of conservation equivalencies need to remain flexible. State regulators who would request approval should not be handcuffed by unnecessary restrictions to serve the "goal" of consistency. There is an approval process in place to ensure that conservation equivalencies are fair and effective.

ISSUE 7: Recreational Release Mortality
ISSUE 8: Recreational Accountability

The striped bass population, all of the regions in which striped bass populations are found, and all of the striped bass fishing communities - both commercial and recreational - will be best served by promoting and supporting a robust and sustainable striped bass fishery. This can be done most fairly and effectively by addressing specific problems and designing exact

solutions, not by imposing across-the-board regulations.

To the extent that there is overfishing occurring and that the striped bass population is overfished, recreational fishing is largely responsible, particularly because of the volume of dead discards produced by recreational fishing and not by commercial fishing. Imposing limitations and restrictions on commercial fishing will not solve a problem that is not being caused by commercial fishing.

ISSUE 9: Coastal Commercial Quota Allocation

For purposes of commercial quota allocation, the Chesapeake Bay needs to be recognized as a producer area and treated accordingly. This means the goal of fishery management in the Chesapeake Bay should be Chesapeake Bay specific, and regulations should be designed to further the goal of achieving a robust and sustainable Atlantic Striped Bass population *in the Chesapeake Bay*, and supporting both the commercial and recreational fishing communities *in the Chesapeake Bay*. This can and should be done in a manner that supports the fishery and the fishing communities throughout the entire coastal area. But the long-term health and success of the entire community will require that the Chesapeake Bay be treated fairly, and not exploited as a mere resource to serve other areas.

Thank you for your attention to these comments, and for giving due consideration to the interests of Virginia's commercial fishermen.

Sincerely,

Michael J. Quinan

cc: Douglas F. Jenkins, Sr.
J.C. Hudgins

TOWN OF WELLFLEET

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To: Emilie Franke - Fishery Management Plan Coordinator April 4, 2021
Atlantic States Marine Fisheries Commission
105 N. Highland Street, Suite 220 A-N
Arlington, VA 22201

Cc: ASMFC Representatives and staff
Maria Broadbent, Wellfleet Town Administrator
Wellfleet Selectboard, Shellfish Advisory Board

From: The Wellfleet Natural Resources Advisory Board

Re: Public comments on Striped Bass PID for Amendment 7

Dear Ms. Franke and ASMFC representatives:

The Wellfleet Natural Resources Advisory Board (NRAB) believes ecosystem-based fisheries management (EBFM) which weighs how managing one stock effects the whole marine ecosystem has become a necessary tool in saltwater fisheries management. We applaud you for acknowledging this and implementing EBFM as ASMFC policy. For this reason, you will be hearing about Atlantic menhaden throughout this letter, how menhaden relate to Striped bass in the grand scheme of things, and why EBFM is key to planning the best way forward for both species.

NRAB has had both Striped bass and menhaden on their radar for years. I have personally observed the plight of Striped Bass since the 1970's as an avid recreational angler and have paid close attention to the various successes and failures realized under ASMFC management.

Below we offer comments on four issues in the PID. Top of the list and of most concern would be the Striped Bass Management Board's (Board's) interest in proposed changes to the striped bass biological reference points (BRP). A more liberal spawning stock biomass threshold or target would clearly be detrimental to the long-term sustainability of striped bass, especially since the stock is currently overfished. Furthermore, as the coastwide menhaden quota is now tied to the new ecosystem reference points, which include striped bass, changes to the reference points could create cascading negative ecosystem effects.

Issue 2 - BRP: Stay with the best available science jntil the next Benchmark Assessment

The current striped bass BRP represents the best available science. Lowering the BRP bar at this time would be an unwarranted and arbitrary decision not supported by science, as highlighted in the PID:

"*The SSB in 1995 was selected as the threshold because that was the year the Commission declared the stock recovered from its depleted status in the 1980s, and many desirable stock characteristics were achieved, such as an expanded age structure. The additional 25% buffer for the target was an ad hoc decision to account for uncertainty in the SSB estimates, and also produced a target value comparable to those observed prior to the stock's collapse in the 1970's.*"

The PID states that model-based alternatives to the current reference points are not available:

"*Potential alternatives to the current reference points are restricted by data and modeling limitations. Unfortunately, the statistical-catch-at-age (SCAA) model currently used in striped bass stock assessment is unable to produce reasonable estimates for model-based reference points, such as MSY or SPR (spawning potential ratio).*"

Issue 5 - Regional Management

This should be removed from the Amendment until a scientific model has been developed to account for regional differences in the fishery and fish stocks - especially while the stock is overfished.

Issue 6 - Conservation Equivalency

Conservation Equivalency should not be part of Striped Bass management. Allowing deviation from the coastwide standard only creates regulatory inconsistencies which makes compliance both confusing for anglers, and enforcement problematic.

Issue 10 - Ecosystem Based Management

In 2020, the ASFMC implemented an ecosystem-based fishery management system for Atlantic menhaden. The "ecological reference points" which define this new approach are inextricably tied to striped bass reference points, and the health of many other ASMFC managed stocks such as bluefish, weakfish, dogfish, and Atlantic herring.

The Striped Bass Management Board should absolutely consider menhaden while weighing decisions in Amendment 7. It would be a logical and reasonable thing to do because of striped bass dependence on abundant menhaden throughout the entirety of their range. Lowering the striped bass biomass target will potentially lead to an increased quota for menhaden, and thus reduced forage for striped bass.

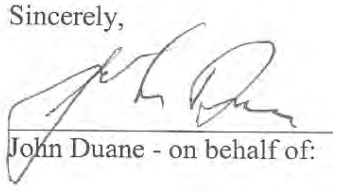
In 2017, when the Menhaden Management Board considered establishing an ecological management system for Atlantic menhaden based on a "rule of thumb" management protocol, commissioners expressed concern that "menhaden-specific ecological reference points" were not yet ready for management use. Accordingly, the Board chose to wait for the Ecological Reference Points Working Group and the Technical Committee to make management recommendations.

This history is important because the Striped Bass Management Board is now considering changes to the Striped Bass Management Plan based on *ad hoc* concerns about the ability to meet the spawning stock biomass (SSB) target; however, this decision is not based on science. In fact, the PID succinctly points out that the fishing mortality rate has never been low enough to meet the SSB target.

It is also important to highlight that the Atlantic menhaden ERPs do not account for the overfished status of Atlantic herring, a predominant forage species in our area. As Atlantic herring are another locally important prey species for striped bass, their overfished status should be a significant concern for striped bass management. A depleted population of Atlantic herring will further stress the striped bass stock, particularly when in tandem with increased fishing pressures on both menhaden and striped bass.

For these reasons, we believe that the Striped Bass Management Board should remove biological reference points from consideration in Amendment 7. If the next benchmark stock assessment provides a viable model-based alternative to the current empirical reference points, then and only at that time would it be appropriate to consider any changes to striped bass reference points. In the meantime, rebuilding the striped bass population, perhaps through effort reductions should be a top priority of the board, and you should embrace the inter-relationships between striped bass and the new ecosystem-based menhaden management system.

Sincerely,



John Duane - on behalf of:

The Wellfleet Natural Resources Advisory Board
John Riehl Chair, John Duane, Tom Flynn
Herb Gstalder, Laura Hewitt, Tom Slack

March 22, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission (ASMFC)
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Striped Bass Public Information Document (PID) for Amendment 7

Dear Ms. Franke,

Founded by anglers in 1973,[1] *Wild Oceans* is the nation's oldest conservation group dedicated to marine fishery resources. Our organization was heavily involved in the successful recovery of striped bass along the Atlantic seaboard, working with the Atlantic States Marine Fisheries Commission as far back as 1978.

When the 2019 Atlantic striped bass stock assessment concluded that striped bass are once again overfished,[2] we urged the Atlantic Striped Bass Management Board to initiate a rebuilding program that does not exceed 10 years, as required by Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan (ISFMP).[3] It has been nearly two years since the release of the stock assessment, and the Board has yet to take up the issue of developing a rebuilding plan. **The Board's most pressing priority should be restoring striped bass stocks to healthy levels.** A rebuilding plan that will restore striped bass to the target biomass by 2029 should either be incorporated in Amendment 7 or initiated through an addendum action at the spring 2021 meeting.

Other issues identified in the Amendment 7 Public Information Document (PID) can contribute to a successful rebuilding effort and can set the stage for a vibrant future of sustainable recreational and commercial fishing opportunities. Below we provide our recommendations.

[1] As the National Coalition for Marine Conservation (NCMC)
[2] Northeast Fisheries Science Center (NEFSC). 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-08; 1170 p. Available from: https://www.nefsc.noaa.gov/publications/crd/crd1908/
[3] See Section 2.6 (Stock Rebuilding Program) in Amendment 6.

Issue 1: Fishery Goals and Objectives

Wild Oceans believes that the existing ISFMP goal and supporting objectives remain relevant to effective management of Atlantic striped bass, and we recommend that this issue be excluded from the scope of Amendment 7. We stress the importance of the first two objectives. Maintaining female spawning stock biomass at the target level helps to ensure a broad age structure that is necessary for long-term reproductive success.[4]

Issue 2: Biological Reference Points

The current biological reference points are appropriate for achieving the ISFMP's goal and objectives, and this issue should be removed from further consideration in Amendment 7. The reference points are designed to guard against recruitment overfishing, which was identified as the major cause of the population crash in the early 1980s.[5] The threshold biomass is based on the status of the female spawning stock in 1995, when a broad age structure was documented in the population.[6] As mentioned above, managing for an expanded age structure in the female population is critical for ensuring successful spawning and recruitment in the long term.

The PID implies that the current target biomass reference point target (SSB_{1995} X 1.25) may be unattainable. We disagree. The 2019 stock assessment found that overfishing has occurred in 13 out of the last 15 years. Furthermore, F_{target} (i.e., the fishing mortality level set to achieve the biomass target) has been exceeded every year since the striped bass stock was declared rebuilt in 1995.[7] Simply put, the implementation of the reference points and associated control rule has been inadequate. Management has not given the reference points the opportunity to perform so that we can evaluate their efficacy. We support exploring model-based reference points in the next stock assessment. However, until these reference points are available, it is premature to consider revisions.

Issue 3: Management Triggers & Issue 4: Stock Rebuilding Targets and Schedule

By design, the management triggers are meant to achieve the goal and objectives of the ISFMP, which we strongly support as noted above. However, even with these triggers in place, striped bass have declined to an overfished condition and chronic overfishing has occurred over the last decade. How and when the Management Board takes corrective action in response to a trigger is critical to its effectiveness. We are recommending that conservation equivalency not be granted when responding to Triggers 1 and 2 (see below). Corrective action should be timely. Two years after striped bass were declared overfished, the fishing public is still waiting

[4] Richards, R.A. and Rago, P.J. 1999. A Case History of Effective Fishery Management: Chesapeake Bay Striped Bass. North American Journal of Fisheries Management, 19: 356-375. https://doi.org/10.1577/1548-8675(1999)019<0356:ACHOEF>2.0.CO;2

[5] Shepherd, G., Nelson, G., Rago, P., Richards, A., and Goodyear, P. 2018. A chronicle of striped bass population restoration and conservation in the Northwest Atlantic, 1979–2016. NOAA Technical Memorandum NMFS-NE-246, 51 p.

[6] See Note 4, p.364, Figure 2.

[7] Northeast Fisheries Science Center (NEFSC). 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Summary Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-01; 40 p. http://www.nefsc.noaa.gov/publications/

on the Management Board to specify a rebuilding program that does not exceed 10 years (Trigger 2).

Triggers 1-4 are sound and should remain as is in the ISFMP. However, Trigger 5, meant to avoid recruitment failure, has proven to be an ineffective indicator. Options should be developed in Amendment 7 for a recruitment trigger that better accounts for inter-annual variability. For example, using a rolling 3-year average of a juvenile abundance index (JAI) to detect recruitment failure will be more responsive to declining trends in recruitment. Options for a revised recruitment trigger should include required management responses. The current wording, "will review the cause of recruitment failure (e.g., fishing mortality, environmental conditions, and disease) and determine the appropriate management action," is too vague to be an effective course corrector.

Issue 5: Regional Management

We are encouraged by the ongoing work to develop the two-stock statistical catch-at-age model that estimates stock-specific characteristics for the Chesapeake Bay stock and the Delaware Bay and Hudson River stocks combined. When complete and approved for management use, the two-stock model could inform a sound regional management program that is better aligned with population dynamics. Until that time, a regional management program should not be undertaken, and the topic should be removed from Amendment 7.

Issue 6: Management Program Equivalency (Conservation Equivalency)

Conservation equivalency is an important issue to address in Amendment 7. We are concerned that permitting conservation equivalency allows states and jurisdictions to sidestep conservation measures necessary for ending overfishing and rebuilding the stock. This issue came to light when 36 conservation equivalency proposals were submitted by 9 out of the 13 states and jurisdictions on the management board in response to the recreational measures in Addendum VI to Amendment 6, the action designed to address overfishing and reduce striped bass fishing mortality to the target by decreasing removals by 18%.[8] After the approved conservation equivalency programs were analyzed as a whole, the result was weakened conservation. Addendum VI is predicted to fall short of the 18% reduction goal, achieving only a 15% decrease in coastwide removals.[9] When the female spawning stock biomass falls below the threshold or when the fishing mortality threshold is exceeded, conservation equivalency should not be granted for any state or jurisdiction.

Issue 7: Recreational Release Mortality

With an average of 2.8 million striped bass dying after release each year,[10] recreational release mortality comprises a significant portion of total fishing mortality and is an issue that warrants attention. The Addendum VI circle hook requirement, implemented at the start of this year, was an important first step toward reducing post-release mortality, and the effectiveness of this measure should be tracked and reported in the annual interstate fishery management plan

[8] Atlantic Striped Bass Technical Committee. Memo to the Atlantic Striped Bass Management Board. 28 Jan 2019.
[9] Appleman, Max. Memo to the Atlantic Striped Bass Management Board. 28. April 2020.
[10] Amendment 7 PID, p. 16.

review. Addendum VI also encouraged angler outreach and education campaigns, and we are pleased that all states on the Management Board have undertaken public awareness initiatives. We support dedicating resources to expand angler education and outreach in order to communicate and garner support for landing, handling and dehooking best practices. Education and outreach should also be geared toward improving the fishing public's understanding of how the environmental factors, such as water temperature, air temperature and salinity, can negatively affect post-release survivability. Options for seasonal closures in areas where a culmination of unfavorable environmental conditions are likely to result in high post-release mortality should also be explored.

Issue 8: Recreational Accountability & Issue 9: Commercial Allocation

Catch accountability and allocation are complex and often contentious issues. While we agree that these issues need to be addressed, we are concerned that doing so through Amendment 7 could lengthen the timeline to develop the amendment. A striped bass rebuilding plan is long overdue, and conservation should be the focus of the Management Board's attention and resources at this time.

Issue 10: Any other issues concerning the management of Atlantic striped bass

Changes in water and air temperature, precipitation and sea-level rise have the potential to affect striped bass productivity, and for these reasons, Atlantic striped bass are ranked as "highly vulnerable" to climate change in the Northeast Fish and Shellfish Climate Vulnerability Assessment.[11] While it is beyond the scope of fishery managers to control climate change, information on climate vulnerability can be used to prepare for and help mitigate climate impacts to fish stocks. For instance, the most recent iteration of the Risk and Uncertainty Decision Tool, developed to methodically account for risk and uncertainty in decision-making, provides a matrix demonstrating how the tool could be applied to striped bass. Climate vulnerability information is factored into the score for environmental uncertainty.[12] Climate change impacts on forage distribution and availability, water quality and habitat important to striped bass life history are important topics that warrant exploring through Amendment 7. Options should be presented to account and prepare for these impacts, and research needs should be prioritized.

Thank you for your consideration.

Sincerely,

Pam Lyons Gromen, Executive Director

[11] A Vulnerability Assessment of Fish and Invertebrates to Climate Change on the Northeast U.S. Continental Shelf Hare JA, Morrison WE, Nelson MW, Stachura MM, Teeters EJ, et al. (2016) A Vulnerability Assessment of Fish and Invertebrates to Climate Change on the Northeast U.S. Continental Shelf. PLOS ONE 11(2): e0146756. https://doi.org/10.1371/journal.pone.0146756

[12] ASMFC Winter 2021 Meeting Materials. Interstate Fisheries Management Program (ISFMP) Policy Board. Draft Risk and Uncertainty Policy.

CBF form letter - 1,245 people

From: [redacted]
Sent: Thursday, April 8, 2021 9:04 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC Fishery Management Plan Coordinator Emilie Franke,

I wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment 7 Public Information Document (PID). Striped bass are one of the most important fish species along the Atlantic coast, supporting robust recreational and commercial fisheries. The importance of striped bass is reflected in its status as Maryland and Virginia's state fish, a designation that represents its importance to the states' economies and culture. As such, the current striped bass population decline is of serious concern to me and ensuring their population is restored quickly should be the primary objective of the ASMFC throughout the Amendment 7 process and into the future. Below are specific comments on the most important issues presented in the PID.

1. Fishery Goals and Objectives

Fishery goals and objectives are a critical part of the fishery management plan that set the context for what the remainder of the plan seeks to achieve. Current goals and objectives in the striped bass fishery reflect the collective desire of anglers, commercial fishermen, and managers to support fisheries while maintaining a precautionary approach to management in response to prior experience with the striped bass moratorium. The objective to manage the striped bass stock to the target is a critical management objective that should be the default for all fishery management plans. Given the current status of the stock, management flexibility and stability should take a back seat to other issues until the stock is closer to its target population.

2. Biological Reference Points

Biological reference points are the tool by which the plan's goals and objectives are implemented. Thus, it is critical that the biological reference points reflect the values of stakeholders and the guiding principles set out in the goals and objectives. The current biomass target (125% of 1995 biomass) and threshold (1995 biomass) represents a time period in which the stock was considered rebuilt and exhibited stock characteristics that support the FMP goals and objectives. Given that explanation, there is no rationale for altering the biological reference points which serve as managers' guidance to achieving the fishery characteristics that are most important to the users and the striped bass population.

Although arguments have been raised about the ability of the striped bass population to meet the target, you must first consider that managers have not been able to achieve the target catch rate. Knowing this, ASMFC should focus on more appropriately managing fishing mortality to target rates over the long-term in order to meet the current biomass reference points.

6. Management Program Equivalency (Conservation Equivalency)

Now is the time to reconsider the widespread use of conservation equivalency in the management of the striped bass fishery. Unfortunately, poorly planned conservation equivalency proposals have all too often resulted in less than intended conservation benefit, with few consequences for the managers who have developed them. This has unfortunately, left the biological condition of the stock in worse shape that it should have been. Particularly when the striped bass stock is in poor condition, the use of conservation equivalency should be prohibited.

7. Recreational Release Mortality

Reducing release mortality of striped bass is one of the easiest ways that anglers can help positively influence the current status of the population. ASMFC should be looking at an "all of the above" strategy including seasonal closures, additional gear restrictions, and angler education opportunities in order to reduce release mortality in the recreational fishery.

10. Any other issues concerning the management of Atlantic striped bass

There are only so many "levers" fishery managers have to pull to control mortality. Identifying and addressing additional external factors that increase mortality will also be critical to striped bass recovery. Climate change, water pollution, loss of spawning habitat, reduced forage fish abundance, and invasive species all pose significant threats to striped bass recovery. These topics should be explored in draft Amendment 7.

Thank you for consideration of these comments and for allowing me to participate in the PID process.

Sincerely,

[redacted]

From: [redacted]

Sent: Thursday, April 8, 2021 9:55 PM
To: Comments
Subject: [External] Striped Bass PID_ TRCP

Dear Fishery Management Plan Coordinator Emilie Franke,

As a recreational angler, I know that striped bass are an essential part of the fabric of coastal communities throughout the region. That's why it is of critical importance that the Commission work diligently to end overfishing and rebuild the striped bass population, not roll back protections for this iconic species.

As you consider Amendment 7, I have some concerns about potential changes to the management plan. The focus should be to reduce fishing mortality, not lowering the standards managers use to determine the health of the fishery.

Of the issues open for comment, the following are of the most importance to achieving that goal.

#2 Biological Reference Points
There is no reason to change the reference points at this time. No new science exists and any change to the target or threshold would be arbitrary.

#5 Regional Management
This should be removed from the Amendment until a scientific model has been developed to account for regional differences in the fishery and fish stocks especially while the stock is overfished.

#6 Conservation Equivalency
Conservation Equivalency should not be part of Striped Bass management. Allowing deviation from the coastwide standard creates regulatory inconsistency.

I know how important this decision is and I want to thank you for taking time to hear the concerns of the recreational fishing community.

Sincerely,
[redacted]



We call on the Atlantic States Marine Fisheries Commission (ASMFC) to postpone Amendment 7 to the Striped Bass Management Plan until a benchmark stock assessment is complete. No scientific justification exists for any of the major changes being proposed. The current management plan is stronger than most ASMFC plans, with adequate targets, management triggers, and rebuilding timelines.

The reason striped bass are overfished is that the plan has not been implemented effectively, with fishing mortality too high to attain the spawning stock biomass target. Instead of moving the goalposts with no scientific justification to do so, managers should focus on reducing fishing mortality. Amendment 7 to the striped bass management plan should be put on hold until the next benchmark stock assessment is ready for management use.

If managers ignore this advice and decide to move forward with Amendment 7, then we the undersigned call on the ASMFC to take the following actions:

1) Remove biological reference points from the Amendment. No scientific justification exists for any changes.
2) End reduction fishing for menhaden, especially in the Chesapeake Bay, the most important striped bass nursery on the East coast. More Menhaden left in the water = more striped bass.
3) Enhance ecosystem-based fishery management by connecting striped bass management to the management of menhaden and other forage species.

Thank you in advance for your consideration.

Sincerely,

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315.	Nicole Lena DiPaolo	Rhode Island	nicolelenadipaolo@gmail.com
316.	Keith	South Carolina	fun4krx2@hotmail.com
317.	Michael Hannon	South Carolina	mhannon12@gmail.com
318.	Peter Schwartz	South Carolina	pschwart00@yahoo.com
319.	Ralph Cipolla	South Carolina	rvcsurfer@aol.com
320.	James Lynch	Tennessee	jim@eventswag.com
321.	Charles	Texas	charlie@cdnnsports.com
322.	Erin Sutton Hammonds	Texas	wickedinktexas@yahoo.com
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325.	Bill	Virginia	rappa57@gmail.com
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327.	David Adams	Virginia	davesjunkemail@yahoo.com
328.	Debbie Bruguiere	Virginia	surfside11@comcast.net
329.	Gus Holzmiller	Virginia	lift4life42@yahoo.com
330.	J. J. Bello	Virginia	jjbello@att.net
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342.	Winn Will	Virginia	ehwcc@yahoo.com
343.	Ryan Caillet	Wyoming	ryancaillet@gmail.com
344.	James Jones		bigjamessr@yahoo.com
345.	John Jannes		jtzannes@gmail.com
346.	Kevin		boost20psi@msn.x
347.	Robert Kelly		musicman7724@aol.com

Backcountry Hunters & Anglers form letter - 130 people

From: [redacted]

Sent: Friday, April 9, 2021 3:50 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Ms.:

As a member of Backcountry Hunters & Anglers, I appreciate the opportunity to provide comments on the Amendment 7 PID, and to advise the ASMFC on how I would like the management of the Atlantic Striped Bass fishery to look in the future.

As you are certainly aware, striped bass are one of the most important recreational fisheries along the east coast. The current amendment process offers both promise and concern - it could restore the currently overfished striped bass stock to health and sustain a valuable resource or permanently reduce striped bass abundance and expose the stock to greater risks in the future. For the benefit of all stakeholders, please consider the health and abundance of the striped bass stock as a primary goal.

In order to achieve that, please advocate for the following during the amendment process:

- The management plan's current goals and objectives should not be changed.
- The current biological reference points should remain in place.
- The current management triggers and stock rebuilding schedule should remain unchanged.
- Management actions taken by the ASMFC when management triggers indicate action is needed.
- When all aspects of the issue are considered, there is no reason for Amendment 7 to treat release mortality any different than any other source of fishing mortality.

In contrast to managing for harvest, managing for abundance increases angler effort, which in turn maximizes the economic, social, and recreational benefits that can be gleaned from the striped bass resource. At the same time, it is also the best way to maintain a healthy and sustainable striped bass stock, creating a situation where everyone, including the bass, can benefit.

Sincerely,

[redacted]

From: [redacted]
Sent: Monday, March 29, 2021 11:20 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Ms. Franke,

Dear Ms. Franke,

Striped bass are critically important to communities along the Atlantic coast. Striped bass fishing supports over 100,000 jobs and generates nearly $8 billion annually for our economy. In 2019, striped bass were declared overfished – a status that should have triggered action by the ASMFC's Striped Bass Management Board to rebuild striped bass to the target biomass within 10 years (by 2029).

The clock is ticking. I urge you to develop and implement a striped bass rebuilding program through Amendment 7 to the Interstate Fishery Management Plan (ISFMP) for Atlantic Striped Bass. For a strong rebuilding program, I also support:

• Upholding the current ISFMP goal and objectives that stress the importance of maintaining biomass at the target level and preserving an expanded age structure in the striped bass population;

• Retaining the existing biological reference points for threshold and target female spawning stock biomass that are based on a time when striped bass were rebuilt and the population exhibited desirable characteristics such as an expanded age structure;

• Prohibiting the use of conservation equivalency for management actions designed to end overfishing or to rebuild the population from an overfished condition; and,

• Exploring research needs and methods to account for environmental factors that affect striped bass, such as water quality, habitat, and forage availability, including how these factors are influenced by climate change.

Thank you for taking my comments into consideration.

Sincerely,
[redacted]

From: [redacted]
Sent: Wednesday, March 10, 2021 9:23 AM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello Striped Bass Board,

Thanks for your time. Please consider the following bullets my official position on the current Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to

address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thanks, I hope for a rapid recovery of the striped bass population.

Sent from my iPhone

ASGA form letter b - 14 people

From: [redacted]
Sent: Friday, April 9, 2021 2:25 PM
To: Comments
Cc: TOM FOTE; C. LOUIS BASSANO; HEATHER CORBETT; Adam S. Nowalsky; ERIC HOUGHTALING; stripercomments@gmail.com
Subject: [External] Comment on Striped Bass Amendment 7 Public Information Document

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Dear Ms. Franke, Mr. Fote, Mr Bassano, Ms. Corbett, Mr. Kowalsky and Assemblyman Houghtaling,

I am a New Jersey resident and a recreational angler. Having watched the decline of the striped bass population first hand, I am concerned for the welfare of the fishery. I am in full agreement with the comments from the ASGA, which I have included below. Thank you for the opportunity to comment.

[redacted]

[redacted]

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of "better business through conservation," reflecting our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Atlantic striped bass, far and away the most commonly recreationally targeted species under ASMFC's jurisdiction, [1] embodies this philosophy. The outlook for our businesses hinges on a robust population of this iconic species from Maine to North Carolina, and with spawning stock biomass at a 25-year low, [2] the future is uncertain.

In principle, we are concerned with the initiation of a comprehensive amendment process when the striped bass fishery has far more urgent needs. The stock was declared overfished nearly two years ago, and while the Atlantic Striped Bass Management Board (hereafter referred to as the Striped Bass Board) took action to end overfishing through Addendum VI, [3] there has not yet been any discussion of a rebuilding plan, despite Amendment 6's own requirement that the stock be rebuilt within 10 years of being declared overfished. [4] Due to data uncertainties associated with the COVID-19 pandemic, it is uncertain whether Addendum VI's provisions were successful in curbing fishing mortality and putting the stock on a path to eventual recovery. Furthermore, some of the specific potential issues to be included in the amendment, such as Regional Management (Issue 5) and Recreational Release Mortality (Issue 7) are being considered for public input even as fisheries scientists are in the midst of research and modeling efforts to inform these issues.

All of this being said, we are aware that it is the will of the Striped Bass Board to move ahead with this amendment, and below we provide our thoughts on each of the issues presented in the PID.

Issue 1: Goals and Objectives

We believe that the current goal and objectives of the Atlantic Striped Bass FMP, as stated in Amendment 6, continue to be appropriate for striped bass management. A robust spawning stock characterized by a broad age structure is critical for reducing recruitment variability for a species whose spawning success largely depends on favorable environmental conditions. [5] Such a diversity of age classes promotes long-term stock health and stability, which in turn supports the health and stability of commercial and recreational fisheries. Such stock stability is a first-order concern, far more important to our coastal fisheries than management stability or flexibility.

Given the suitability of the current goal and objectives for striped bass management, we recommend that this issue be removed from further consideration for inclusion in Amendment 7. We believe that the goal and objectives are not the problem, but instead the fact that the Striped Bass Board has not adhered to them in its actions over the past decade.

Issue 2: Biological Reference Points

Before addressing this issue, we first want to express our disappointment with the Striped Bass Board's inclusion of the following sentence on page 7 of the PID: "Given the 2018 benchmark assessment found overfishing was occurring and the SSB was below the target even during those years that the striped bass population was at a historically high level, the current reference points may be unattainable given current objectives for fishery performance." This sentence is editorial in nature, is based on speculation rather than science, and is

fundamentally misleading to members of the public without a background in fisheries science who depend on the PID to provide a transparent and neutral accounting of the issues that are up for consideration.

With regard to the issue of Biological Reference Points, ASGA supports the best available science, but recognizes that due to the absence of a stock-recruitment relationship and the fact that model-based reference points are not available, we must instead consider "empirical" reference points based on a given year. We continue to believe that 1995 is an appropriate reference year given the abundance and broad age structure of the striped bass population at that time, in accordance with Amendment 6's goal and objectives. Contrary to the editorial comment in the PID, the most recent stock assessment's finding that overfishing was occurring even when the stock was at this high level suggests that if fishing mortality is controlled, we may well be able to achieve the current target level (125% of 1995 spawning stock biomass). While some have criticized the 1995 reference points as arbitrary, any other reference points selected now, in the absence of model-derived reference points, would also be arbitrary. The rationale for using 1993 as a potential alternative reference year (with lower threshold and target values) "because SSB was lower than in 1995 but still produced a strong year-class" is flawed given the lack of a stock-recruitment relationship for striped bass unless the stock is at very low levels. We believe that 1995 remains an appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7. The fact that the Striped Bass Board has failed to maintain a healthy striped bass stock is not a suitable reason for lowering the goalposts.

Issue 3: Management Triggers

As with Issue 2, we were disappointed to see another instance of editorializing, without the presentation of any scientific evidence, included in this section of the PID, on page 11: "The latest science also indicates that the SSB target has never been reached which raises questions that it may be an unreasonably high management target given current objects [sic] for fishery performance and changing or altered ecosystem conditions (e.g., climate change, and changes in other predator and prey population abundance)."

We are of the view that the four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management and that—if adhered to by the Striped Bass Board—they will promote the long-term health and stability of the species. We are puzzled by the statement on page 11 that the Striped Bass Board is criticized for having "knee-jerk" reactions to point estimates of fishing mortality given that coastwide recreational regulations have only changed twice since Amendment 6 was implemented in 2003 (Addendum IV in 2014 and Addendum VI in 2019). [6],[7] We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment. Identifying recruitment failure is critical for enabling the Striped Bass Board to anticipate future reductions in striped bass availability and adjust regulations accordingly. A metric that better buffers against inherent interannual recruitment variability, such as a three-year rolling average rather than the individual index values for each year, could be a better indicator of whether there is a problem. In addition, because such poor recruitment will eventually affect the abundance and/or size distribution of striped bass available to the fishery, we recommend that this trigger require stronger action of the Striped Bass Board than simply "to review the cause of recruitment failure and determine the appropriate management action."

Issue 4: Stock Rebuilding Target and Schedule

We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. A longer rebuilding timeline would not only extend the period during which the stock is not at the target level, but would also inject greater uncertainty regarding the outcome of the rebuilding process. Both of these scenarios present a threat to the commercial and recreational businesses that depend on a healthy and stable striped bass population.

In addition, we are strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7. The stock, according to Amendment 6, must be rebuilt to the target level by 2029, but the Striped Bass Board has only addressed curbing fishing mortality through Addendum VI (the effectiveness of which is uncertain due to pandemic-induced data limitations for 2020), and has yet to address the larger issue of rebuilding. In the interim, we are concerned that the stock will continue to languish, and foresee that, if rebuilding is not addressed in the Amendment, the Striped Bass Board may not elect to take action to rebuild the stock until the 2022 stock assessment update, which could restart the rebuilding timeline and extend it until 2032.

Issue 5: Regional Management

Ideally, striped bass would be managed at the individual stock level to ensure that each of the spawning populations along the U.S. east coast meets the characteristics of a healthy striped bass stock outlined in Amendment 6's goal and objectives. However, the two-stock SCAA model, which could be used to develop separate reference points for Chesapeake Bay and the "mixed ocean stock," is not yet ready for management. In addition, our understanding of the relative contributions of individual spawning populations to fisheries up and down the coast remains incomplete, although genetic approaches offer promise for such determinations moving forward. [8] In the absence of such stock discrimination capabilities, the Striped Bass Board would need to enact coastwide management measures to protect the most vulnerable stock in this mixed-stock fishery. Furthermore, we contend that at this time, when the striped bass stock is at a 25-year low, we should be focused on rebuilding

the stock using the tools at our disposal, rather than considering a fundamental shift in management approach. Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7. With the Striped Bass Board having recently demonstrated its lack of ability to prevent even a single stock from becoming overfished; now is not the time to consider parsing that stock into multiple management units

We also would like to raise our concern with the statement on page 12 that Chesapeake Bay's striped bass catch is heavily male-skewed. The statement appears to be made in an effort to potentially justify having different (higher) fishing mortality reference points in Chesapeake Bay due to the preponderance of males; however, no source to substantiate that claim is provided. While Kohlenstein (1981) surmised that most male striped bass spend their entire lives in Chesapeake Bay and that females emigrate at age 3, [9] multiple studies have since challenged this claim. Most recently, Secor et al. (2020) determined that both males and females depart Chesapeake Bay at sizes of over 80 centimeters. [10] And while observed sex data in Chesapeake Bay do indicate a majority of males at the sizes commonly encountered in the recreational fishery, [11] it is unclear whether the sex sampling occurs in the same areas as the recreational fishery, which is important given potential sex-specific patterns of occurrence in Chesapeake Bay. We urge the Striped Bass Board to refrain from continuing to state that most striped bass caught in Chesapeake Bay are male—and thereby that regional management with Chesapeake Bay-specific fishing mortality reference points may be justified—without providing supporting evidence.

Issue 6: Management Program Equivalency (Conservation Equivalency)

We are not unconditionally opposed to the notion of conservation equivalency (CE) in circumstances where the striped bass population is healthy and in areas/times when the characteristics of the striped bass population are unique (e.g., smaller striped bass in Chesapeake Bay). However, we also believe that CE can be abused by individual states in a way that jeopardizes the effectiveness of coastwide conservation efforts. For example, New Jersey's CE provisions under Addendum VI gave its anglers the ability to harvest striped bass less than 28 inches and greater than 35 inches, undermining the goal of protecting fish outside of the coastwide 28-35 inch slot limit. [12] By the same token, the greater management uncertainty resulting from CE (since no two regulations can truly be "equivalent" in terms of fishery impact) can compromise coastal conservation success, as seen by the fact that, after accounting for CE in the implementation of Addendum VI, the fishery only had a projected 42% probability of meeting the necessary 18% reduction in mortality (as opposed to a 50% chance of doing so before CE). [13]

We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives. While some states may object to such a need for accountability and point to the high levels of uncertainty inherent in state-specific MRIP estimates, we contend that if MRIP estimates are suitable for projecting removals based on CE, then they should be suitable for accountability purposes as well. On a related note, we are puzzled by this statement on page 14 of the PID: "It is challenging to evaluate the effectiveness or success of CE programs once implemented because of the difficulty in separating the effects of the CE program from other factors like angler behavior and availability of fish that determine the amount of catch and release (see Issue 7 and Issue 8 on page 16 and 19, respectively) that occurs." In our eyes, the challenge of disentangling the effectiveness of CE programs is no different than disentangling the effectiveness of any management program from factors such as angler behavior and fish availability, and in no way negates the need for accountability. Rather, it highlights the need for human dimensions studies to assess how changes in regulations and fish availability may impact angler effort and, ultimately, fishing mortality (see Issue 10).

Issue 7: Recreational Release Mortality

As the PID illustrates, recreational release mortality has always been a part of the recreational striped bass fishery, and it always will be with any fishery that is primarily recreational and primarily catch-and-release. Table 3 in the PID shows that the annual number of removals due to recreational release mortality has been relatively consistent since 1995, indicating that the release mortality levels that we see today are not incompatible with a healthy fishery. That does not mean that it is not important to continue to work toward reducing release mortality, and we continue to support research and angler education to achieve that goal. The Striped Bass Board, however, must recognize that such release mortality should not be considered "waste" given the fact that many striped bass fishermen voluntarily release their catch and derive a benefit from catch-and-release fishing—an attitude that is a significant driver of the recreational striped bass fishery and economy. The high proportion of fishing mortality attributed to recreational release mortality, despite the relatively low 9% assumed post-release mortality estimate, is a testament to the immense amount of angling activity oriented around catch-and-release fishing.

We do believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, if the Striped Bass Board is committed to taking action now, we recommend that such efforts focus on outreach and education to anglers in order to promote best practices for safe release (ASGA is able and willing to serve as a partner in this effort). We are not unconditionally opposed to specific effort reductions (time and area closures) should research and projections demonstrate that such actions would have a significant positive conservation impact; however, given the value we place on the opportunity to target striped bass, we would prefer to only use this approach as a

last resort.

Issue 8: Recreational Accountability

We recognize that the commercial sector, which fishes under hard quotas, is far more accountable for its share of striped bass fishing mortality than is the recreational sector, and fundamentally believe that improving recreational accountability is critical for ensuring the long-term vitality of the striped bass fishery. That being said, recreational data collection efforts such as the Marine Recreational Information Program are not suitable for in-season monitoring. While a Recreational Harvest Limit (RHL) would in theory be an ideal way to promote such accountability, we are aware of the challenges inherent in this system as well (e.g., "chasing the RHL"), which the Mid-Atlantic Fishery Management Council is currently addressing through its Recreational Reform Initiative. [14]

The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9: Commercial Allocation

While we generally would not comment on commercial allocation issues, it does appear that the landings period used for allocation, which dates back nearly 50 years, is woefully out of date. We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10: Other Issues

Research Needs

In recent years, social scientists have increasingly focused on the human dimensions of recreational fisheries—quantifying, for example, the relative contributions of various fishing activities (e.g., harvest or catch-and-release) to angler wellbeing. Such studies can also be used to better predict how changes in regulations and fish availability can impact fishing effort and fishing mortality. For a species that experiences enormous recreational fishing effort such as striped bass, human dimensions research could be immensely helpful for characterizing angler preferences and values, determining optimal management alternatives, and forecasting fishery impacts in the absence of in-season monitoring capabilities. Indeed, several studies have examined such questions for striped bass specifically. [15],[16] However, the Striped Bass Board rarely, if ever, acknowledges such research, let alone considers it for use in management. We recommend including in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and providing a pathway by which such research could be applied to future management discussions.

Under Issue 5, we mentioned continued efforts (e.g., genetic research) to better understand the relative contributions of individual striped bass stocks to the overall coastal population targeted by anglers. We recommend that the Striped Bass Board support such stock discrimination research wherever possible, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Striped bass are the foundation of the recreational fishing community and economy along the east coast. Ensuring a healthy population is critical for ensuring that our businesses are able to thrive. We urge the Striped Bass Board to put the resource first as it navigates the Amendment 7 process.

We thank you for your consideration of our comments.

Sincerely,

Tony Friedrich, Vice President and Policy Director

Willy Goldsmith, Ph.D., Executive Director

1. Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, February 28, 2021. ↑
2. ASMFC. 2019. Summary of the 2019 Benchmark Stock Assessment for Atlantic Striped Bass. http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport_April2019.pdf. ↑
3. ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf. ↑
4. ASMFC. 2003. Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass. http://www.asmfc.org/uploads/file/sbAmendment6.pdf. ↑

5. Secor, D.H. 2000. Spawning in the nick of time? Effect of adult demographics on spawning behaviour and recruitment in Chesapeake Bay striped bass. ICES Journal of Marine Science 57: 403–411. doi:10.1006/jmsc.1999.052. ↑
6. ASMFC. 2019. Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/54d2aa96AtlStripedBassAddendumIV_Oct2014.pdf. ↑
7. ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf. ↑
8. LeBlanc, N.M., et al. 2020. Genomic population structure of Striped Bass (Morone saxatilis) from the Gulf of St. Lawrence to Cape Fear River. Evolutionary Applications 13(6):1468-1486. doi:10.1111/eva.12990.↑
9. Kohlenstein, L.C. 1981. On the Proportion of the Chesapeake Bay Stock of Striped Bass That Migrates into the Coastal Fishery. Transactions of the American Fisheries Society 110:168–79.↑
10. Secor, D.H., et al. 2020. Differential migration in Chesapeake Bay striped bass. PLoS ONE 15(5): e0233103. doi:10.1371/journal.pone.0233103. ↑
11. National Marine Fisheries Service. 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. Northeast Fisheries Science Center Reference Document 19-08. https://repository.library.noaa.gov/view/noaa/23031. ↑
12. ASMFC. 2020. Next Steps for Management. Memorandum from Max Appelman to the Atlantic Striped Bass Management Board. http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC_Report_April2020.pdf. ↑
13. Ibid. ↑
14. Mid-Atlantic Fishery Management Council. Recreational Reform Initiative. https://www.mafmc.org/actions/recreational-reform-initiative (Visited February 28, 2021). ↑
15. Carr-Harris, A., and S. Steinback. 2020. Expected Economic and Biological Impacts of Recreational Atlantic Striped Bass Fishing Policy. Frontiers in Marine Science (6). doi:10.3389/fmars.2019.00814. ↑
16. Murphy, R.J., et al. 2019. Angler attitudes explain disparate behavioral reactions to fishery regulations. Fisheries 44(10):475-487. ↑

From: [redacted]
Sent: Monday, April 5, 2021 11:42 AM
To: Comments
Subject: [External] Amendment 7 PID Comment

Hello.

Below are my comments with regards to Amendment 7 to the Striped Bass Interstate Fishery Management Plan.

We need to manage for abundance in biomass. A lot of arguments during the open hearings and against the below comments were that the 'science isn't there,' if that's the case, then we should be taking the MOST CONSERVATIVE measures possible and reevaluating once the 'science' and methods of measuring biomass and efficacy of various management methods are 'there'. I am absolutely appalled as to how blind people can be when there are large groups of highly active and involved fishermen that are crying out THAT SOMETHING NEEDS TO BE DONE... management for abundance is PARAMOUNT. These fish are worth more to us all in the water and in good numbers!

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient to recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into

the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.
Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).
Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

THANK YOU!

From: [redacted]
Sent: Thursday, April 8, 2021 8:43 PM
To: Comments
Subject: [External] Striped Bass PID

I support the following with regards to Striped Bass

- Moratorium (coast and bay, no recreational or commercial harvest) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.
- Seasonal Closures, no targeting Striped Bass in traditional spawning areas, such as the Hudson River and enforced by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for Striped Bass.

Thank You [redacted]

From: [redacted]
Sent: Friday, March 5, 2021 4:55 PM
Cc: Comments; Dan Mckiernan; Michael Armstrong; Rep. Sarah K. Peake; Sherry White; Raymond Kane; Patrick Paquette; Douglas M. Amorello; DR. GARY A. NELSON; GARY SHEPHERD
Subject: [External] Re: Striped Bass PID

I would like to state loudly and clearly that the health of the Atlantic Striped Bass stock – not harvest – should be the highest priority of Amendment 7.

I support the following recommendations...

1. Moratorium (coast and bay, no recreational or commercial harvest) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.
2. Seasonal Closures, no targeting Striped Bass in traditional spawning areas, such as the Hudson River and enforced by local authorities.
3. Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
4. Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
5. Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
6. Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
7. Limit treble hooks to one per artificial lure.
8. Require barbs on artificial lures be flattened when used for Striped Bass.

Striped Bass are far more valuable alive than on a dinner plate!

Please feel free to contact me with any questions as I am happy to reply.

Best,
[redacted]

From: [redacted]
Sent: Monday, April 5, 2021 1:09 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,
Lifelong Maine resident, longtime recreational angler and fisherman. I have reviewed what are areas of concern by others of like interest and I would like to reiterate what they have stated as my same opinion. The fisheries of Maine and everywhere along the east coast are more delicate than they have been and we should do what we can to protect them for the future generations. So my 3 year old son will be able to catch striped bass in the future in abundance like his grandfather did. Everything benefits the growth of the fish population.
Here is what Stripers Forever states regarding the public information document on Amendment 7 :

Note that the current management regime under Amendment 6 was adopted in 2003, and failed in its objective to rebuild stocks.

Please refer to the PID for specific language on each of the following issues.
Issue 1: Goal ("To perpetuate… migratory stocks of striped bass.") is fine.

Objective 4 ("Foster quality and economically viable recreational, for-hire, and commercial fisheries."): remove the commercial reference. Recreational anglers are the overwhelmingly dominant user both in terms of numbers of participants and economic impact. Managing for commercial interests runs counter to the greater public good.

Objective 6 ("Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures."): Gamefish status would solve this.

Issue 2: SF's position is to maintain existing biological reference points (BRPs) since we know that the stock can attain those levels as it has in the past.
Issues 3 & 4: Management triggers & timeline ("Up to ten years."): Keep what is there and follow what they say should happen. Triggers were ignored after implementation in Amendment 6 and that is at least part of why the stocks are where they are today after 18 years of a ten-year plan. For Issue 4, SF's position is to rebuild the stocks, and maintain, sustain abundance, vs. manage for "maximum sustainable yield."
Issue 5: Regional Management is a good idea. Chesapeake Bay is the Striped Bass' primary nursery and should be managed differently than the coastal fishery should be different. In addition we are strongly recommending the adoption of seasonal closures in spawning locations such as the Hudson River. Striped Bass should be given the opportunity to spawn without human intervention. Closing the Hudson River, Ny Bight and Raritan Bay to Striped Bass Fishing in the spring would protect large females as they migrate from spawning grounds into their coastwide distribution. This is a no brainer and we believe it will dramatically protect and improve the spawning stock biomass. It won't be easy though, unless you have game fish status.
Issue 6: Conservation Equivalency should be status quo, but with consequences when states adopt CE measures that fail to achieve desired outcomes.
Issue 7: Recreational Release Mortality: The circle hook requirement is fine as implemented in Addendum VI. Treble hook use on artificial lures, and proper handling should be a continuing education process.

Issue 8: Recreational Accountability: Implementing recreational harvest limits (RHLs) will be a problem until the Marine Recreational Information Program (MRIP) is supplying timely and high confidence data.
Issue 9: Coastal Commercial Quota Allocation; The simplest answer is to make it a game fish. End of story. Harvesting juvenile fish in Chesapeake Bay and larger, breeder-size females along the coast runs counter to achieving management goals.
Issue 10: Other issues: “How would you like management of the Atlantic striped bass fishery to look in the future?” Stripers Forever stands by its mission: Make it a Game Fish.

Stripers Forever remains committed to fighting for Striped Bass designation as a game fish, protected from commercial harvest. That is beyond the ASMFC’s charter, and so the following recommendations reflect what we believe to be steps that are both reasonable and aggressive, carving the surest path to rebuilding healthy, abundant Striped Bass stocks, based on the goals of the ASMFC as stated in the PID for adoption of Amendment 7.

- Moratorium (coast and bay, no recreational or commercial harvest) of 10 years’ duration to ensure the success of the ASMFC’s 10-year stock rebuilding plan.
- No targeting Striped Bass in traditional spawning areas, as determined by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for striped bass.

Seems to make the most sense to me. We can do this now and have it benefit a lot more people than those even involved in the comment of this. Thank you for the opportunity to comment.

[redacted]

From: [redacted]
Sent: Saturday, March 6, 2021 10:51 AM
To: Comments
Subject: [External] Fwd: Striped Bass PID - Connecticut Resident Comments

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---------- Forwarded message ---------
From: [redacted]
Date: Sat, Mar 6, 2021 at 10:48 AM
Subject: Striped Bass PID - Connecticut Resident Comments
To: CRAIG.MINER@CGA.CT.GOV <CRAIG.MINER@cga.ct.gov>, HYATTWILLIAM01@GMAIL.COM <HYATTWILLIAM01@gmail.com>, JUSTIN.DAVIS@CT.GOV <JUSTIN.DAVIS@ct.gov>, KEITH.WILLIAMS@CT.GOV <KEITH.WILLIAMS@ct.gov>, KURT.GOTTSCHALL@CT.GOV <KURT.GOTTSCHALL@ct.gov>, KYLE@JBTACKLE.COM <KYLE@jbtackle.com>, MAKOMIKE3333@YAHOO.COM <MAKOMIKE3333@yahoo.com>, MELISSA.ZIOBRON@CGA.CT.GOV <MELISSA.ZIOBRON@cga.ct.gov>, ROBERT.LAFRANCE@QUINNIPIAC.EDU <ROBERT.LAFRANCE@quinnipiac.edu>, comments@asfmc.org <comments@asfmc.org>

To all ASFMC board members and to all others concerned in Connecticut and beyond:

Recreational fishermen represent the vast, vast majority of the money that is spent in the striped bass industry across the Atlantic states that are concerned.

First and foremost: **Please** designate the Striped Bass as a gamefish!!!

Issue 1: Goal (“To perpetuate… migratory stocks of striped bass.”) is good to go but:

)bjective 4 (“Foster quality and economically viable recreational, for-hire, and commercial fisheries.”): remove the commercial reference. Recreational anglers are the overwhelmingly dominant user both in terms of numbers of participants and economic impact.

*Managing for commercial interests runs counter to the greater public good.

)bjective 6 (“Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures.”): Gamefish status would solve this.

Issue 2: My position is to maintain existing biological reference points (BRPs) since we know that the stock can attain those levels as it has in the past.
Issues 3 & 4: Management triggers & timeline (“Up to ten years.”): Keep what is there and follow what they say should happen. Triggers were ignored after implementation in Amendment 6 and that is at least part of why the stocks are where they are today after 18 years of a ten-year plan. For Issue 4, My position is to rebuild the stocks, and maintain, sustain abundance, vs.

manage for “maximum sustainable yield.”
Issue 5: Regional Management is a good idea. Chesapeake Bay is the Striped Bass’ primary nursery and should be managed differently than the coastal fishery should be different. In addition, I strongly recommending the adoption of seasonal closures in spawning locations such as the Hudson River.
Striped Bass should be given the opportunity to spawn without human intervention. Closing the Hudson River, NY Bight and Raritan Bay to Striped Bass Fishing in the spring would protect large females as they migrate from spawning grounds into their coastwide distribution. This is a no brainer and I believe it will dramatically protect and improve the spawning stock biomass. It won’t be easy though, unless you give game fish status to striped bass.
Issue 6: Conservation Equivalency should be status quo, but with consequences when states adopt CE measures that fail to achieve desired outcomes.
Issue 7: Recreational Release Mortality: The circle hook requirement is fine as implemented in Addendum VI. Treble hook use on artificial lures, and proper handling should be a continuing education process.
Issue 8: Recreational Accountability: Implementing recreational harvest limits (RHLs) will be a problem until the Marine Recreational Information Program (MRIP) is supplying timely and high confidence data.
Issue 9: Coastal Commercial Quota Allocation; The simplest answer is to make striped bass a game fish. End of story. Harvesting juvenile fish in Chesapeake Bay and larger, breeder-size females along the coast runs counter to achieving management goals.
Issue 10: Other issues: “How would you like management of the Atlantic striped bass fishery to look in the future?” I stand by my mission: Make it a Game Fish.

[redacted]

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Sent from Gmail Mobile
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Sent from Gmail Mobile

From: [redacted]
Sent: Friday, February 26, 2021 11:00 AM
To: Comments
Subject: [External] Striped Bass PID

February 19, 2021

I appreciate the opportunity to comment in response to the ASMFC Public Information Document. Amendment 7 is a critical component of our east coast striped bass management plan.

I'm a resident of Massachusetts and an avid fly fisherman. I frequent the Massachusetts, Rhode Island, and Connecticut coastlines for stripers. I also occasionally travel north in pursuit of stripers. They are an iconic and treasured New England sport fish.

New England recreational fishing has been growing in popularity in recent years, drastically so over this past year, due in part to COVID. It was both a boon for a COVID-suppressed economy, and a significant challenge to protecting the current and future health of our waters. Recreational fishing has fueled local economies, but it also brought front and center concerns about fisheries management and preservation. Fly and tackle shops, and coalitions of concerned fishermen in New England have worked together in our local communities and beyond to find a balance that protects our valuable resources while helping to fuel our economies. Finding the necessary balance requires hard work.

We are at an absolutely pivotal moment right now with striped bass. Amendment 7 and the responsible management it must drive matters in the immediate. There can be no kicking the can down the road. Taking a sharp focus on protecting the striper population - by maintaining female spawning stock biomass targets and by working to reduce overfishing, as established in Amendment 6 - is critical not only to the health of recreational fishing but to our broader economy. The Atlantic states have to be in this together, and it needs to happen now.

Respectfully,

[redacted]

From: [redacted]
Sent: Friday, April 9, 2021 12:43 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Emilie Franke,
I appreciate the opportunity to provide comments on the Amendment 7 PID, and to advise the ASMFC on how I would like the management of the Atlantic Striped Bass fishery to look in the future.
As you are certainly aware, striped bass are one of the most important recreational fisheries along the east coast. The current amendment process offers both promise and concern - it could restore the currently overfished striped bass stock to health and sustain a valuable resource or permanently reduce striped bass abundance and expose the stock to greater risks in the future. For the benefit of all stakeholders, please consider the health and abundance of the striped bass stock as a primary goal. In order to achieve that, please advocate for the following during the amendment process:
- The management plan's current goals and objectives should not be changed.
- The current biological reference points should remain in place.
- The current management triggers and stock rebuilding schedule should remain unchanged.
- Management actions taken by the ASMFC when management triggers indicate action is needed.
- When all aspects of the issue are considered, there is no reason for Amendment 7 to treat release mortality any different than any other source of fishing mortality.
In contrast to managing for harvest, managing for abundance increases angler effort, which in turn maximizes the economic, social, and recreational benefits that can be gleaned from the striped bass resource. At the same time, it is also the best way to maintain a healthy and sustainable striped bass stock, creating a situation where everyone, including the bass, can benefit.
Sincerely,
[redacted]

Comments

From: Chris Piatek <rightempire@gmail.com>
Sent: Friday, April 09, 2021 4:35 PM
To: Comments
Subject: [External] Comment for Amendment 7
Attachments: PastedGraphic-5.tiff

ASFMC board, please accept this email as my formal comments regarding the PID on Amendment 7. My name is Chris Piatek, a soon to be full-time resident of Wells, ME(currently Waterbury, VT. I work as a sales rep in the outdoor industry working with a number of retailers, outfitters, and brands involved in the fishing industry. Impact on these topics have direct impact on my income as well as the recreational fishing I enjoy with my family. In the near future I plan on becoming a Maine Guide working with a friends registered guide service. I am pursuing this from my own passion to help other anglers become better with their own impact for the fisheries.
I have listened in on most of the State's hearings and been following the topics and comments closely for the past few months due to the heightened attention for the lack of management. I am really unsure how a management board does not follow scientific data?

1. Goals and Objectives
I believe this issue be removed form further consideration for inclusion in Amendment 7. The goal and objectives are not the problem, but instead the fact that the Striped Bass Management Board has not adhered to them in its actions over the past decade.

2. Biological Reference Ponts
I think 1995 is a appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7. The fact that the the Striped Bass Management Board has failed to maintain a healthy stripped bass stock is not suitable reason for lowering the goal posts.

3. Management Triggers
The view that the four management triggers related fishing mortality and spawning stock biomass(triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management. I think that it may be wise to revisit Trigger 5, which attempts to addresss recruitment failure but may not be an appropriate indicator of such a failure.

4. Stock rebuilding Target and Schedule
I believe a 10 year rebuilding timeline currently specified in Amendment 6 should be maintained. I would also request developing a rebuilding plan for Atlantic Striped bass as part of Amendment 7

5. Regional Management
Due to the lack of scientific data and the dynamics of the migratory patterns of Striped bass regional management should not be considered.

6. Conservation Equivalency
CE should only be considered if striped bass are neither overfished nor experiencing overfishing. C.E creates too many uncontrollable variables by State's management.

7. Recreational Release Mortality

The data for this called out is really inaccurate, I know every angler has their own ability to catch and release. Better education should improve this tremendously.

8. Recreational Accountability
This issue should be removed due to the lack fo attainable data.

9. Commercial Allocation
How can data over 50 years old even be in discussion? A commercial fishery that has not even come close to quota for a few years now? An obvious indicator this fishery is troubled.

10. Other issues
Research on other dimensions affecting this fishery should be discussed.

Thank You for accepting my comments,

Chris Piatek
chris@rightempire.com
413 441 5364 cell



www.rightempire.com

Disclaimer:
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Comments

From: Kendall <Kendall@keerandheyer.com>
Sent: Friday, April 09, 2021 1:43 PM
To: Comments
Subject: [External] Striped Bass PID
Attachments: Kendall Keer.vcf

Good afternoon,

The Striped Bass fishery is something that I came to appreciate later in my fishing career. Learning more about these fish has opened my eyes to how fragile their species is. I would love for one day to be able to teach my own children how to appreciate these fish and do so in a sustainable way.

Best Regards,
Kendall Keer
1001 Richmond Ave.
Pt. Pleasant Beach, NJ 08742
(732)892-7700 Ext 103
(732)899-9752 Fax

Comments

From: Kevin Blinkoff <kevin@onthewater.com>
Sent: Friday, April 09, 2021 1:22 PM
To: Comments
Subject: [External] Striped Bass PID
Attachments: Striped Bass PID comments.docx

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I am a Massachusetts resident and the editor in chief of On The Water Media, which includes On The Water Magazine, On The Water TV, the Striper Cup tournament, and the StriperFest celebration.

On The Water was launched on Cape Cod in 1996 and has grown for the past 25 years to cover all waters where Atlantic striped bass swim. Like so many other fishing- and tourism-related businesses in our region, our existence depends upon the abundance of striped bass. There is perhaps no better example than our Striper Cup, which is a catch-and-release tournament that has attracted national sponsors and grown to over 5,000 participants.

I am writing today as a private angler who has fished recreationally for striped bass since moving to Massachusetts in 2000, and my comments are not being made on behalf of my employer.

I understand that the Striped Bass Management Board has the difficult task of balancing conservation goals with management stability and regulatory consistency, but I want to emphasize that when it comes to striped bass, a largely catch-and-release fishery with outsized importance to Atlantic coast recreational fishermen and the recreational fishing economy, meeting conservation goals must take priority.

The recovery of the striped bass stock has been held up as an example of management success, but with the spawning stock biomass at 25 year low, I urge the Board to use this Amendment process as an opportunity to look back at what brought us to this point and adjust the Plan to prevent it from happening again.

1. **Fishery Goals and Objectives**
   I believe the existing goal and objectives are in line with current fishery needs and priorities. One priority that is not explicitly recognized in the existing objectives is meeting the needs of catch-and-release anglers. While their needs should be balanced with anglers who like harvest a fish, the fmp should recognize the cultural shift toward voluntary catch and release that is not only a function of regulations and availability.
2. **Biological Reference Points (BRPs)**
   I support the current BRPs because they are adequate to achieve the current fishery goals and objectives, especially considering that under these BRPs, the fishery and population were healthy in the mid-2000s. While they are arbitrary in nature, changing them at this time, when the stock is overfished, will be viewed by the

public as “moving the goalposts” and will erode trust in the management process. While it is a challenge to do with BRPs, they should attempt to balance the needs of diverse striped bass fisheries by ensuring a diverse age structure, including an abundance of large fish available to anglers.

3. **Management Triggers**
   I understand that finding a balance between being precautionary to ensure a healthy population while also maintaining stability in the fishery is a challenge in setting management triggers. I support back-testing triggers to ensure that the conditions of a specific trigger will not be met so frequently that it causes unreasonable regulatory instability. That said, I support keeping management triggers 1-4 and revisiting management trigger 5.
   Due to their geographically limited and well-studied anadromous spawning, striped bass managers have an advantage over most other managed fisheries when it comes to the quality of spawning and recruitment data. Spawning indices, young-of-year studies, and recruitment estimates are predictive and available within a time frame that could be used to enact precautionary changes that are based in the best available science. I ask the board to use hindsight to their advantage and explore the creation of a trigger that takes advantage of recruitment data and would have triggered management action earlier than what was ultimately Addendum IV in 2014.
4. **Stock Rebuilding Target and Schedule**
   I support maintaining the ten-year maximum rebuilding plan schedule.
5. **Regional Management**
   The Board should hold off on the implementation of regional management until a multi-stock model has been approved for management use and the population shows signs of recovery. Instead, the Board should implement coastwide and Chesapeake Bay wide regulations for regulatory consistency and stability.
6. **Conservation Equivalency**
   I do not support the current use of conservation equivalency for striped bass because there is too much uncertainty in the underlying data used to justify these programs. The Board should restrict the use of conservation equivalency when the population is overfished, even if the states agree to state-specific accountability, because the variability in the catch data will create significant challenges.
7. **Recreational Release Mortality**
   The Board should recognize that recreational release mortality is not “waste,” given the fact that many striped bass fishermen voluntarily release their catch and derive a benefit from catch-and-release fishing—an attitude that is a significant driver of the recreational striped bass fishery and economy. Management should not focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released. Instead, I urge the Board to continue to focus on education and outreach to address release mortality because this issue is difficult to control through regulation other than the circle hook requirement already implemented.
8. **Recreational Accountability**
   Current limitations of recreational catch data make it difficult to measure accountability using an RHL on an annual basis. Instead, use stock assessments that occur over 2–3-year intervals to assess changes to recreational catch and its impact on the population while improving recreational catch data collection using electronic reporting and other programs supplemental to the Marine Recreational Information Program.
9. **Coastal Commercial Quota Allocation**
   Conservation efforts should be shared equally between the recreational and commercial sectors. Allocation is worth revisiting because it is based on out-of-date data from 50 years ago.
10. **Other Issues**
    The Board should explore opportunities to encourage research into factors that affect spawning success and consider efforts such as habitat enhancement to increase the likelihood of spawning success.

Thank you for consideration of my comments.

Sincerely,

Kevin Blinkoff

Cataumet, MA

Comments

From: Joseph A Holbeche <jholbeche@umassd.edu>
Sent: Friday, April 09, 2021 1:06 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] striped bass pid
Attachments: StripedBass comments.docx

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I am a recreational angler and have been fishing for all my life. I have worked as a fisheries observer, a fisheries biologist for the Massachusetts Division of marine fisheries, and I am in the midst of completing my master's in marine biology. That being said I am speaking for myself and would just like to thank you again for allowing me to have my voice be heard in the process.

I am concerned with the initiation of this amendment at a time when it seems the striped bass fishery has more pressing needs considering the spawning stock biomass is at a 25 year low.

Here are my thoughts on the issues presented in the PID

Issue 1: goals and objectives

I believe that the current goals and objectives of the Atlantic striped bass fmp, as stated in amendment 6, continue to be appropriate for striped bass management. A robust spawning stock with a broad age structure is critical for reducing recruitment variability for species whose spawning success is largely dependent on favorable environmental conditions in a quickly changing world. I believe diversity of age classes promotes the long term stability of the stock.

I recommend that this issue be removed from further consideration for inclusion in amendment 7. I believe that the goal and objectives are not the problem. The problem lies in the fact that the Striped bass board has not adhered to them in its actions.

Issue 2: Biological reference points

I am in support of the best available science and believe that the 1995 year is an appropriate reference year given the abundance and broad age structure of the striped bass population at that time. Contrary to what was stated in the PID the most recent stock assessments findings that overfishing was occurring even when the stock was at a high level suggests that if fishing mortality is controlled, we may be able to achieve the current target level. I believe that the 1995 year remains an appropriate reference year and recommend that the biological reference pints remain unchanged and that this issue be removed from further consideration in amendment 7. Just because the striped bass board has failed to

maintain a healthy striped bass stock is not a suitable reason for lowering the goal post. I believe lowering the goal post would not only be bad for striped bass but also would cause the public to completely lose faith in the commission.

Issue 3: management triggers

I believe that the four management triggers related to fishing mortality and spawning stock biomass included in amendment 6 are suitable for achieving the goal and objectives of striped bass management. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but may not be an appropriate indicator of such a failure.

Issue 4 stock rebuilding target and schedule

I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. In addition, we are strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7

Issue 5: regional management

Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 conservation equivalency

I believe that conservation equivalency should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that conservation equivalency injects into the management process. States that do choose to implement conservation equivalency must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7: recreation release mortality

I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multiyear study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8: recreational accountability

The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement conservation equivalency.

Issue 9: commercial allocation

It does appear that the landings period used for allocation, which dates back nearly 50 years, is woefully out of date. I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10: Other issues

I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, which could ultimately inform stock-specific management.

Comments

From: Rick Drew <rpdrew@hotmail.com>
Sent: Friday, April 09, 2021 12:51 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Management Plan Amendment 7 PID
Attachments: HistoricFisheriesreport.pdf

Rick Drew has shared a OneDrive file with you. To view it, click the link below.

HistoricStripedBassReport 6.pdf

To Whom It May Concern,

As a long-time recreational saltwater angler and former commercial fisherman, I am writing to provide my input and feedback regarding the Amendment 7 PID. I have been fishing and studying Striped Bass for over 50 years. In addition, with many known environmental challenges, and the planned development of our east coast oceans from Wind Energy Expansion, Striped Bass will be under greater pressure than ever in the foreseeable future.

Issue #1 - The current goals and objectives of the Striped Bass Management Plan should not be changed or amended. They are sensible and the result of a significant amount of discussion and debate, and should be preserved in their current form.

Issue #2 - The biological reference points also should not be altered. These reference points have been negotiated and widely agreed upon by the community, and changing them also negatively impacts our ability to achieve consistent, longitudinal analyses to inform our understanding of the health of the striped bass population.

Issue #3 - Similarly, I see no reasonable basis for changing management triggers, which have similarly been agreed upon and consistently applied, contributing to stability in the management of the fishery.

Issue #4 - For the same reasons, stock rebuilding requirements triggered by thresholds should not be changed.

Issue #6 - Finally, I do believe we should seek to finally put an end to so-called "conservation equivalency," which leads to inconsistent responses by Atlantic states to 1-4 above, complicating the ability to monitor the differential effect of conservation efforts by state, encouraging states and various stakeholders to find loopholes in the regulations, and also ignores the fact that striped bass are an anadromous, migratory species that often travel great distances in a single season, and don't really pay attention to conservation measures on a state-by-state basis. Nor do anglers, frankly. This heterogeneity in conservation policy simply contributes to confusion, even amongst well-intentioned anglers. On a given weekend, I can find myself fishing for striped bass in three or four different states, and despite the fact that I pay close attention to striped bass conservation issues, even I'm not always sure what regulation to apply in all circumstances. Simplicity and

clarity are critical - especially for recreational anglers who, we now know, account for 90% of the striped bass mortality rate.

I am attaching the first scientific study on Striped Bass that I am aware of and a favorite report on the mid Atlantic fisheries prepared by Rachel Carlson. In particular they recognized way back then that consistency of management along the east coast was important. Please refer to pages 62, 63 - "Recommendations" in the historic Striped Bass Study. Even in 1941 there was recognition that coastwide planning was important. Also, the first recorded data on Striped Bass landings that I can find is in Rachael Carlsons Mid Atlantic study 1940 2,221,000lbs (page 14).

During the 1970s and 1980s catching a few striped bass in a season was a proud achievement. The past few seasons - and last fall in particular - we have witnessed a heartening return of striped bass to our local nearshore waters. Rather than exploit this opportunity as we have in the past, we really need to apply the hard-earned lessons from the past several decades to act as responsible stewards of this incredible fishery.

Sincerely,

Rick Drew
2 Powder Hill Lane
East Hampton, NY 11937
631-903-0751 (cell)

Comments

From: Taylor Vavra <taylorvavra@icloud.com>
Sent: Friday, April 09, 2021 11:27 AM
To: Comments
Subject: [External] Striped Bass PID Comments
Attachments: ASMFC_WRITTEN_COMMENTS_040921.pdf

Taylor Vavra

445 Warburton Avenue

Hastings on Hudson, NY 10706

Mobile: (914)522-9507

email: taylorvavra@icloud.com

April 9, 2021

RE: Comments on the Atlantic Striped Bass FMP Amendment 7 PID (Public Information Document)

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Fax: 703.842.0741

comments@asmfc.org (subject line: Striped Bass PID)

Dear Ms. Franke:

Enough is enough. The warning signs have been apparent for years and ignored. The management triggers need to be reevaluated; action did not come quick enough. Those triggers were designed to prevent overfishing and an overfished stock and that did not happen. The ASMFC has flat out failed at its mission and in its

responsibility to manage Striped Bass for 'abundance' and here we are again at a major and consequential crossroads for the species. The crux of this failure is the plain reality that over and over again the commission has managed Striped Bass to cater to wants and desires of a small segment of the Striped Bass user community, its economic beneficiaries, while ignoring the needs of the species itself.

That was not and is not the purpose of the commission. Your responsibility lies not in making humans richer but in doing whatever is necessary to protect and ensure a healthy and vibrant stock for the greater public good. We cannot let our wants and desires as humans cloud our vision and direct our management practices. In fact, by doing so we are actually doing the complete opposite and selfishly putting our time with Striped Bass ahead of future generations and failing to make sure that the resource is healthy, abundant and available for those that follow us. If the commission can shift its focus to taking care of the stock the end result will be a sustainable resource that will be available for our use.

The time for half measures and status quo management is gone. The commission can no longer move at the speed of molasses going uphill. Two more years to initiate a new management plan is too long. We have hit rock bottom and the stock is now at a 25 year low, let that sink in...a 25 year low. The board needs to quickly initiate strong and comprehensive measures to save Striped Bass from a total and unrecoverable collapse. This is why I am here speaking today, to propose just that, strong but necessary changes to the current management plan set forth that will result in a quick and effective rebuilding of the stock.

The complexity of management plans up until now has been detrimental to the stock. This complexity opens up doors to abuse and inabilities to quantify science, something we have heard from the technical committee. In light of that we are suggesting a 10-year coast-wide moratorium on the harvest of Striped Bass for both the commercial and recreational fisheries.

We do not have the time to wait for the board to put effective and tangible regulations into place. The two years between now and then will have a grave effect on the stock as a whole and specifically the SSB. A harvest moratorium would cut through the red tape and get things moving in the right direction immediately. In turn it would provide the board ample time to conduct studies (such as revisiting the 25-year-old catch and release mortality study), reevaluating stock assessments and forming a well thought out and effective management plan that will prevent this from happening again.

In regard to regional management, while we do need overall coastwide management we are suggesting a set of regional seasonal closures to productive spawning locations such as but not limited to the Hudson River, NY Bight and Raritan Bay. This is a no brainer: allow Striped Bass to stage, spawn and re-disperse to their coastal migratory destinations without any human disruption. Give them the best chance possible to spawn so we can once again see the strong year classes which drive a healthy and prolific stock. NY proposed adopting these measures in the past but failed to get NJ on board. Allowing fishing during the spawning run is the equivalent of inviting the grim reaper into our hospital nurseries, it should without a doubt be a clear and present danger to the health of the stock.

Conservation equivalency needs to be eliminated. Time and time again it has proven itself as nothing more than a way for states to escape the accountability of conservation minded management plans. The technical committee clearly stated that by allowing states to adopt their own measures it would make it nearly impossible to scientifically quantify the results of said regulations and therefore make it impossible to gauge their success or failure. With the stock currently declared overfished with overfishing occurring we are now at a 25-year low, there is no room for conservation equivalency in Striped Bass management.

Enforcement continues to be an issue. While it may be difficult to increase enforcement due to funding, it would not be difficult to revise the penalties for those who choose to break the law, and this would serve as a deterrent. Stronger punishments for poaching such as counting black market catch against the commercial quota, a

lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture and larger fines.

Lastly, in terms of recreational mortality, you need to update the current 25-year-old catch and release mortality study to reflect updates to current gear, awareness, regulations, climate change, etc. Education is one of the most ignored and important steps to engage the public and allow them to be the stewards for positive change and conservation. The board needs to invest in broad and strategic education on catch and release best practices, environmental issues facing Striped Bass (such as climate change and water temperatures), the health concerns with consuming Striped Bass, the importance of an ecosystem with available and abundant prey and a responsibility to self-enforce regulations for the betterment of the stock. In addition, recreational mortality can be reduced through limiting treble hooks to one per artificial lure and requiring barbs on artificial lures to be flattened when used for striped bass.

In addition to the above summary of my feelings on these issues I would also like to provide these bullet points, all of which I strongly support.

- Moratorium (coast and bay, no recreational or commercial harvest) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.
- No targeting Striped Bass in traditional spawning areas, as determined by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or
- egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for Striped Bass.

Thank you,

Taylor Vavra
National Board Member
www.stripersforever.org
mobile: 914.522.9507

Comments

From: Peter Whelan <pawhelan@comcast.net>
Sent: Friday, April 09, 2021 11:25 AM
To: Comments
Subject: [External] Striped Bass Comments
Attachments: image001.emz

Dear ASMFC
Please see my comments attached to the latest PID document on Striped Bass

Striped Bass PID Comment

1. **Fishery Goals and Objectives**
   Status Quo

2. **Biological Reference Points**
   Status Quo

3. **Management Triggers**
   Status Quo

4. **Stock Rebuilding Targets and Schedule**
   Status Quo

5. **Regional Management**
   Status Quo

6. **Management Program Equivalency (Conservation Equivalency)**
   CE should not be utilized any time the stock is overfished or if overfishing is occurring. States utilizing CE should be held accountable if overfishing occurs due to CE.

7. **Recreational Release Mortality**
   Efforts should be focused on education and outreach to promote best practices.

8. **Recreational Accountability**
   Recreational accountability should be implemented for states utilizing CE.

9. **Coastal Commercial Allocation**
   Status Quo

Regards
Peter Whelan

Captain Peter A. Whelan
Shoals Fly Fishing and Light Tackle
100 Gates Street
Portsmouth, New Hampshire 03801

www.shoalsflyfishing.com

Comments

From:	Steve Culton <swculton@yahoo.com>
Sent:	Tuesday, April 06, 2021 1:53 PM
To:	Comments
Cc:	WILLIAM HYATT; Sen. Craig A. Miner; ROBERT LAFRANCE; Justin Davis; Rep. Melissa Ziobron
Subject:	[External] Striped Bass Amendment 7 PID Comments
Attachments:	Culton_SBAmendment7PIDComments.docx

These are my comments for the record. I have been having email issues so I will include a separate word document and will cut and paste the text below.

Thank you for your consideration.

Steve Culton

Steve Culton Comments on Striped Bass Amendment 7 PID

Issue 1 (Goals and Objectives): Current goals and objectives are sufficient. This issue should be removed.

Issue 2 (Biological Reference Points) 1995 is an appropriate reference year, so BRPs should remain unchanged. This issue should be removed.

Issue 3 (Management Triggers) The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I agree with those who suggest we revisit the specifications of Trigger 5, which attempts to address recruitment failure.

Issue 4 (Stock Rebuilding and Target Schedule) The 10-year rebuilding timeline currently specified in Amendment 6 must be maintained. A specific, results-driven rebuilding plan is urgently needed.

Issue 5 (Regional Management) This issue should be removed from further consideration.

Issue 6 (Conservation Equivalency) I am sick and tired of certain states taking advantage of CE to obtain a favored nations status.
CE in theory may have upsides but in practice it is damaging and contrary to the ASMFC's mission. CE should only be an option if striped bass are neither overfished nor experiencing overfishing – and that's what's happening. States

that choose CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7 (Recreational Release Mortality) I concur with those who recommend that reduced release mortality efforts should focus on outreach and education to anglers.

Issue 8 (Recreational Accountability) The issue of recreational accountability should be removed from Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6). CE must not be used as a tool by certain states so they can kill more stripers.

Issue 9 (Commercial Allocation) The Striped Bass Board should work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10 (Other) I agree with the ASGA position: include guidance for expanding human dimensions research in the striped bass fishery; provide a pathway by which such research could be applied to future management discussions. Support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers.

Please continue to fight the good fight!

Comments

From: Anglerpmh <anglerpmh@aol.com>
Sent: Sunday, April 04, 2021 9:59 PM
To: Comments
Subject: [External] Striped Bass PID
Attachments: Striper Letter - 2021.docx

Emilie,

My letter is also attached.

Thank you,

Paul

4/4/21

ASMFC Striped Bass Board,

Thank you for the opportunity to comment on the striped bass public information document. I am 66 years old and have been an avid striper fisherman since I was a teenager. That is until last year when the regulations you mandated broke my heart and caused me to give up striper fishing. I have always been a conservationist and want to see our striper stocks become healthy again with fish of all sizes in the biomass. In my prime I used to fish from various jetties in New Jersey from 75-100 nights a year. As I grew older, I also enjoyed targeting them from my boat. However, I am a trophy fisherman but don't get me wrong, I release the vast majority of stripers I catch and have released some in excess of 40 pounds. Still though, what made striper fishing enjoyable for me was my relentless pursuit of trophy striped bass. I have caught documented fifty pound plus bass from both the shore and my boat. Although I realize the chances of catching a record striped bass is remote, that is what I always strived for. Without being able to keep a potential record or personal best striped bass, I have no interest in fishing for them. It wasn't people like me who caused the problem we are now in yet we are being unfairly punished for it. I will support whatever measures you may come up with that will allow me to once again harvest at least one or two huge stripers each year. That being said I would like to offer the following comments and suggestions.

1. The stocks will rebound much quicker with a minimum size of around 35". Larger size limits worked to rebuild the stocks back in the late 1980's and early 1990's and it will work again. Most people along the entire east coast favored doing this but you instead chose a slot limit.
2. You absolutely have to consider closing the season during the pre-spawn and spawning season. It should be closed to all fishing including catch and release since there is said to be a c&r mortality rate of 9%. The bass are

congregated during this period and easy to catch. For instance, in the Raritan Bay area in the spring many people are catching up to 50 or more bass of all sizes in a single day. You can almost walk from boat to boat as there are so many fishermen out there. It is a shame that this carnage is allowed while I can't even keep one trophy striper during the year. Closing the season to harvest would certainly help but closing it to c&r fishing at that time would help a lot more. The argument that it is not enforceable is a bunch of bull too. Law enforcement officers know when you are targeting stripers and when to issue a citation or just a warning. One very important point too is the fact that a lot of people obey the law. If they know targeting stripers, even for c&r, is prohibited they will obey that law.

3. There should be a stamp or some sort of permit to harvest a large striper. Funds from this stamp could be used to buy out the commercial sector, to improve habitat or for more law enforcement.
4. A study should be done as to why so many stripers are now migrating in federal waters rather than close to shore. I'm sure beach replenishment and the destruction of marine habitat is an important factor. However, there are other factors as well that should be studied with corrective action being taken where possible. I used to catch far more stripers from shore when the stocks were in far worse shape then they are today. Many of today's anglers were spoiled as they started fishing for stripers at their peak periods of abundance during the early 2000's. While that was fun, there is still plenty of good fishing if you know how to fish for them. Unfortunately, many of today's anglers can't catch stripers without the internet, a cell phone or seeing someone else's rod bent.
5. We need more law enforcement and stricter penalties. While I previously stated there are many people who obey our regulations, there are also many who don't. It is an absolute disgrace how many people fish beyond the three-mile line. It is also a disgrace how many people keep more than their limit including undersized fish and bring them to market. This has to be stopped!
6. We need to reduce the 9% mortality rate on released stripers. The circle hook mandate is a good start but we can do more. There should be more education as how to handle and properly release stripers. Also educate people especially the light tackle crowd or the danger of fighting the fish too long or fishing for them when the water is really warm.
7. I generally believe that conservational equivalency is a good thing since for many states or regions the sizes of the fish they catch may be quite different. However, for our coastal waters the size range of stripers is pretty much the same for all states. Therefore, CE should not be used for this species. Last year, prior to the slot fish being mandated, NJ was denied its CE proposal for one fish at 34 or 35". The board said it would not be good for one state to be able to harvest big fish yet a little later they approved the Massachusetts proposal to allow their commercial fishermen to harvest stripers at 35" or greater. They also approved a trophy season for Chesapeake Bay. That was totally unfair and I don't think the rest of the states should be raising stripers so that they can be harvested in the Chesapeake or by commercial fishermen from Massachusetts.
8. Simply make striped bass a no-sale or gamefish along the entire east coast. Buy out the commercial fishermen if need be. I don't want to hear that the commercial catch is relatively insignificant when compared to the recreational catch. Illegal sales of stripers are a huge problem and they are unaccounted for when determining how many fish were harvested by the commercial sector.
9. While it's beyond the scope of your authority, something has to be done about the seal population. Their population is out of control and they are wreaking havoc on our stripers and other species.

Sincerely,

Paul Haertel

Comments

From: Fred Jennings <peakdawn@yahoo.com>
Sent: Sunday, April 04, 2021 6:11 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; Patrick Paquette; Douglas M. Amorello; GARY SHEPHERD; DR. GARY A. NELSON
Subject: [External] Striped Bass PID
Attachments: 20210403 CEEEE Letter to ASMFC on Amendment 7 PID Comments 3 April 2021.pdf

Center for Ecological Economic and Ethical Education

Post Office Box 946 *Phone: (978) 356-2188 (w) or 617-605-3150 (c)*

Ipswich, MA 01938 *email: ecologicaleconomics@yahoo.com*

4 April 2021

RE: Comments on the Atlantic Striped Bass FMP Amendment 7 Public Information Document (PID)

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Fax: 703.842.0741

comments@asmfc.org (subject line: Striped Bass PID)

Dear Ms. Franke:

I am writing you today with my reactions to the Atlantic Striped Bass Amendment 7 Public Information Document (PID) recently issued by the ASMFC. I am inspired by the invitation to comment as solicited in this statement:

> ***This is your opportunity to inform the Commission about changes observed in the fishery, actions you feel should or should not be taken in terms of management, regulation, enforcement, and research, and any other concerns you have about the resource or the fishery, as well as the reasons for your concerns.***

The PID describes "the primary question" for public comment as: **"How would you like management of the Atlantic striped bass fishery to look in the future?"** It also states the primary GOAL of the previous Amendment 6 as including the following aims: "To perpetuate … migratory stocks of striped bass; to allow … long-term maintenance … a self-sustaining spawning stock; and … essential habitat." "Objectives" were specified, including:

- Manage striped bass fisheries … to maintain stock size at or above the target female spawning stock biomass level and a level of fishing mortality at or below the target exploitation rate.

- Manage fishing mortality to maintain an age structure that provides adequate spawning potential to sustain long-term abundance of striped bass populations.

- Provide a management plan that strives, to the extent practical, to maintain coastwide consistency of implemented measures…

- Foster quality and economically viable … fisheries.

- Maximize cost effectiveness of current information gathering…

- Adopt a long-term management regime…

- Establish a fishing mortality target that will result in a net increase in the abundance (pounds) of age 15 and older striped bass in the population, relative to the 2000 estimate.

The questions raised for public comment are then identified as follows: "Are the existing goal and objectives of Amendment 6 still in line with current fishery needs and priorities? Which specific priorities (if any) are missing from the existing goal or objectives? Which of the existing objectives (if any) should be removed or refined? Do the existing objectives balance the need for management stability, flexibility, and regulatory consistency? Which of these three themes do you value most?" These are all extremely interesting questions that I will take up below.

But first, I will offer some general remarks. I think that all these goals are worthy ones that should be supported. The problem, from my perspective anyway, is that the ASMFC decisions in the past have not reflected or been true to these lofty ambitions and goals. Until the managers actually take responsibility for living up to these standards, our fisheries have no chance of thriving. The ASMFC has suffered in its decisions from myopic goals that have led to

enduring consequences that either were not of concern to them or that were not anticipated. The whole fisheries management attitude needs a good dose of the Precautionary Principle for much more conservative practices and policies, instead of playing a risky game of brinksmanship with our fisheries which has persistently led to disaster…

Comments on Issue 1: I guess my first comment is that Amendment 6 has done a piss-poor job in achieving its sundry objectives, given the current state of the fishery for wild striped bass, which has finally been designated as "overfished" by official documents (after an inexcusably long delay in admitting to that increasingly obvious fact). But I do not blame Amendment 6 for that lamentable result; the ASMFC itself is responsible for the execrable management of this fishery and so a major revision is needed not only in the goals and objectives, but also in your own approach to dealing with this fishery. I will have a number of suggestions at the end of this letter on that topic.

Comments on Issue 2: Biological Reference Points: The 1995 BRPs should be left as they are, and you need to quit moving the goalposts when these thresholds and targets are not being met to justify "business as usual" instead of implementing the triggers that have been built into the plan. It is the ASMFC that has failed to implement this plan, and that needs to be fixed. The fact that the SSB has been below the target since 2003 and below the threshold for over a decade is stark confirmation of the failure of the ASMFC to live up to its own Fisheries Management Plans!

Comments on Issues 3 & 4: Management Triggers and Thresholds: See comment on ***Issue 2*** above; first of all, what the ASMFC needs to do is to heed its own management plan and implement these triggers when pulled! Have you any idea how infuriating it is to watch you ASMFC members managing this fishery so irresponsibly? Most of us no longer have any confidence that your members have any concern for the health of this stock… The PID states that: "The management triggers are intended to keep the Board accountable…" but when they are not enforced or applied, there is no accountability and declaring your "good intentions" is just BS on a Road to Hell, if you are not acting in accord with those guidelines. My own view is that these triggers should be tightened and so made into "hair triggers" until this stock is rebuilt, because the ASMFC cannot seem to act on behalf of the welfare and health of this fishery without being forced onto a more disciplined path. You have already shown you can't be trusted to heed your own guidelines before reaching the point where the fishery has deteriorated so far that you're no longer able to deny the harms that you have done to it. That is no sane way to manage anything for ecological health.

You have asked the following questions under ***Issues 3 & 4:*** What is an appropriate timeframe to respond to overfishing or overfished determinations? ***Answer****: You should move as quickly and expeditiously as possible as soon as there is any indication of overfishing, and not fart around or delay your responses!* What is more important, rebuilding the stock quickly, or mitigating impacts to fisheries? ***Answer****: This answer is so obvious that even asking it as you have suggests your twisted priorities. Of course you need to rebuild the stock as quickly as possible. You have a long history of NOT responding quickly – or at all – to early signals of declining fisheries. This has to change.* In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock? ***Answer****: Rebuild the stock quickly. Impose conservative measures right away.*

Issue 5: Regional Management: This is a difficult issue that I'm not sure I'm sufficiently well-informed to remark intelligently on. I believe that it is a good idea to manage the Chesapeake Bay fishery differently from the coastal fishery for wild striped bass. I also very strongly urge you to close all fishing in spawning areas during the spawn!!!

Issue 6: Conservation Equivalency: Conservation equivalency is probably a good thing, as it allows states to adapt their management strategies to specific conditions that uniquely prevail within their own waters. However, when these variations result in any excessive harvest of fish, then severe penalties should be imposed upon those states.

Issue 7: Recreational Release Mortality: A required use of circle hooks for all bait fishing is a good idea. I also think that circle hooks should be recommended for most other fishing methods as well. I have used long-shanked hooks in my fly fishing for many years, where I bend the straight part of the shank around enough to aim the point of the hook a bit inside the eye of the hook (because non-offset circle hooks for fly tying remain very hard to find), and I've found that this practice results in more lip-hooked fish. I also think that *all* hooks in the fishery for wild striped bass should be barbless (or have the barbs bent down). I've not used a barbed hook for many years and it makes no real difference other than that you have to avoid a slack line while playing a fish, which is also a lot more sporting… You should also ban any use of treble hooks, especially for bait, and outlaw the use of gaffs in this fishery as well. As for education, it is absurd that there is almost no effort to teach anglers how to handle fish properly for release!

Issue 8: Recreational Accountability: I don't think that Recreational Harvest Limits (RHLs) would be a useful means of curbing or controlling what has become an unacceptably high recreational harvest. First of all, the regulations on allowable catches should be far more restrictively structured to limit the recreational harvest. For example, instead of a slot limit of 28" to 35", why not narrow this slot to only 28" to 30" (although I would prefer to see a far lower slot of 18" to 20" or 20" to 22" as a management tool) as a means of limiting the harvest? Very few of my fly fishing friends ever keep a fish, but some of them do. However, rumors abound of lots of undersized fish being killed with little to no enforcement of the existing limits. There is also a significant black market for illegally-caught stripers. Many of these sources of mortality are ignored, while little to nothing is being done to mitigate or reduce them…

Issue 9: Coastal Commercial Quota Allocation: The simplest answer – and one you have always been reluctant to entertain – is to end the commercial fishery for this extremely valuable and prized recreational species by making striped bass a game species, and managing it for abundance of live fish in the ocean, rather than trying to maximize the number of dead fish in the supermarket for commercial purposes. But this is not a solution you would tolerate.

Having established that the most sensible answer to the problem is not on the table as far as you are concerned, then some other comments should be made that fall short of gamefish solutions. Basically, the 1970s quotas were set far too high at that time, and led to a drastic decline in the fishery. When the striped bass fishery was declared "fully recovered" during the 1990s, the quotas that had existed were reestablished despite that they were too high and – lo and behold, surprise, surprise! – they have brought the same result: an overfished and collapsing fishery!

Another problem is that when those commercial quotas were set too high during the 1970s, recreational angling was far less impactful and popular than it has become in recent decades, which has exacerbated the problem most severely. At this point, if you're not willing or ready to set the commercial quotas coastwide to zero (even though that's what you should do), then you should tighten these commercial quotas and address yourselves to the recreational harvest to tighten that too (as I have suggested above). And EDUCATE angers on handling fish as a means to reduce their release mortality, and institute other regulations as suggested above on types of hooks, etc.

Issue 10: Other Issues: You have posed the following question for which you want "stakeholder feedback", namely: **"How would you like management of the Atlantic striped bass fishery to look in the future?"** Here's my answer…

- ***Institute an immediate moratorium on all harvests of wild striped bass coastwide:*** I have fished for striped bass since 1956, through good years and bad years, and the world-class fishery we had in the late 1990s is just GONE now, and I credit the myopic approach of the ASMFC for that result. Those of us who fished a lot during the 1990s understand what we have lost! An increasing anger felt toward the ASMFC for your apparent indifference to the destruction of this fishery has spread quite rapidly among recreational anglers. I'm aware that Stripers Forever has called for a ten-year moratorium, but I'm not convinced that it would take that long for this fishery to recover enough for the necessity of such a lengthy period for no harvest.

- ***Short of an immediate moratorium, since you won't tolerate that as an option, institute more restrictive management measures for wild striped bass:*** First of all, selectively harvesting only large breeding females makes no sense at all, and that practice is responsible for much of the rapid decline in this fishery. Also, the largest striped bass on the Atlantic coast are chock full of PCBs and methyl mercury toxins, and we should not be consuming these fish in any event! A slot limit that only allows a harvest of much smaller fish would be far safer (in terms of their consumption) and would leave the larger females to do what they do best: to reproduce and thereby assure the long-term health of the fishery! The harvest of small fish in Chesapeake Bay also appears to be excessive, although I don't truly know enough about that to comment intelligently.

- ***Stop allowing any fishing at all in spawning areas during the time that striped bass are spawning:*** This seems like such a no-brainer I'm almost embarrassed to bring it up, but for the fact that it needs saying!!!

- ***Ban commercial gill nets:*** If you're going to insist on having a commercial fishery for wild striped bass at all, then require it all to be hook and line, like what has been done in Massachusetts. That might help a lot…

- ***Count the commercial discard mortality against the commercial quota:*** This also seems to be a no-brainer.

- ***Let's require stronger penalties for those caught poaching wild striped bass:*** Too often, people caught poaching wild striped bass are let off with a slap on the wrist, which has no preventive effect. The fines are frequently far less than the value to them of what they are doing, so they continue to break these laws… The black market harvest should be estimated and counted against the commercial quota; lifetime bans on license holding (recreational or commercial) should be imposed on all guilty poachers for multiple offenses; gear and boat seizures should be

implemented, along with prohibitive fines. Give them reasons for regret!!! And if more money is needed for increased and better law enforcement, institute a $25 Striped Bass Stamp.

- ***Limit or ban treble hooks; require all hooks to be barbless (or to have bent-down barbs); and ban gaffs:*** These restrictions would help to reduce release mortality in these fish by a considerable amount, I believe.

Well, I've probably said much more than you wanted to hear, but these are my thoughts on the matter. I hope you take them into account in your deliberations, although I'm not so naïve as to believe that you will do so, given your previous history of ignoring all of the input you get from the recreational angling community in favor of commercial interests and short-term, myopic goals. The very essence of your mission should be to promote the enduring health of the fisheries that you are responsible for, but in this your record is really abysmal, in my humble opinion anyway.

Please give anglers a reason to restore all the faith we've lost in the fisheries management system of this country.

Thank you for your attention.

Most sincerely and respectfully,

Frederic B. Jennings Jr., Ph.D.
President, CEEEE

Copies to: Dr. Mike Armstrong, Environmental Analyst, MA Division of Marine Fisheries
Dan McKeirnan, Director, MA Division of Marine Fisheries
Representative Sarah K. Peake, MA State House, ASMFC Commissioner
Ms. Sherry White, Assistant Regional Director, US Fish & Wildlife Service
Raymond Kane, Outreach Coordinator, Cape Cod Commercial Fishermen's Alliance
Patrick Paquette, Massachusetts Striped Bass Association, member, Striped Bass Advisory Panel
Douglas M. Amorello, member, Striped Bass Advisory Panel
Gary Shepherd, NMFS, NEFC, WHOI, member, Striped Bass Technical Committee
Dr. Gary A. Nelson, MA Division of Marine Fisheries, member, Striped Bass Technical Committee

Comments

From: Todd Forrest <tafquercus@gmail.com>
Sent: Thursday, April 01, 2021 9:46 PM
To: Sen. Craig A. Miner; Comments; WILLIAM HYATT; Justin Davis
Cc: stripercomments@gmail.com; Mark R
Subject: [External] STRIPED BASS PID
Attachments: amendment 7 commentary.pdf

Dear Senator Miner

I am writing to voice my perspective about important considerations that the Atlantic States Marine Fisheries Council should address in the development of Amendment 7 to the Interstate Fishery Plan for Atlantic Striped Bass. I am grateful for your attention to this matter and for your work on behalf of Connecticut residents who understand, value, and invest in our marine resources.

I am a recreational angler from Connecticut. For the past five years, I have fish for striped bass approximately 70 days a year both from shore and from a boat, primarily in the western Long Island Sound. I frequently hire CT-based guides, keep my boat in a Connecticut marina, and purchase nearly all of my tackle and supplies from CT-based tackle shops. Since I fish only with artificial lures in western Long Island Sound, I rarely catch fish that would make the slot limit. I would not keep any striped bass regardless of limits or regulations. I fish for striped bass because they are beautiful wild fish that inhabit the beautiful, fragile coastal waters of Connecticut. Striped bass provide me with a profound connection to nature.

I strongly believe that ASMFC should manage for abundance so that striped bass populations are robust enough to weather climate change, watershed pollution, increasing coastal urbanization, and other anthropogenic disturbances. Available science and the experience of many Connecticut anglers show that striped bass populations have been declining for more than a decade. The biology of striped bass and the continued degradation of their spawning areas leads to uneven spawning success from year to year. Therefore, it is clear that in order to maximize abundance, we need to protect the greatest number of spawning-age bass in the population at any given time. Every issue in Amendment 7 should be singularly focused on preserving spawning-age bass while providing the greatest benefit to the most people.

To that end, my comments on the 10 issues presented in the PID are:

i) Issue 1: The overall goal is adequate. I would ask that objective 7 under the goal be altered to read: *Establish a fishing mortality target that will result in a net increase in the abundance (number of fish) of age 6 and older striped bass in the population*
ii) Issue 2: 1995 should continue to be used as the benchmark for spawning stock biomass.
iii) Issue 3: Management Triggers—the current triggers should be preserved, and enforced.
iv) Issue 4: Stock Rebuilding Target and Schedule-- I believe stock should be rebuilt quickly if it falls below the thresholds.
v) Issue 5: Striped bass is a single migratory species and should be managed consistently across its range.
vi) Issue 6: There should be no conservation equivalency—striped bass is a single migratory species that should be managed consistently across its range.
vii) Issue 7: The science shows that recreational anglers cause the majority of striped bass mortality and profoundly impact abundance. Therefore, if the science indicates that limiting recreational angling through gear limitations, seasonal closures, area closures, catch-and-release, or other methods will positively impact striped bass abundance, they should be considered.
viii) Issue 8: For the reasons stated above, RHL should be considered if the science indicates it will increase striped bass abundance.

ix) Issue 9: Updating the allocation of commercial harvest of striped bass should be considered in Amendment 7. Perhaps the charter\party boat allocation catch should be managed through the commercial allocation in all states, since this fishery focuses on harvest. The harvest allocations should be based on science, should not impact abundance of spawning age fish, and should be subordinate to the recreational fishery, which contributes substantially more to the economies of all states where striped bass are caught.

x) Issue 10: The following should be priorities for Investments

(a) Research to determine the impacts of the recreational fishery on striped bass abundance
(b) Investment in watershed protection within the spawning grounds
(c) Investment in law enforcement and increased penalties for poaching

Thank you for your attention to this matter. The future of striped bass depends on your informed and thoughtful action on Amendment 7.

Sincerely,

Todd Forrest

Ridgefield, CT

c.: Justin Davis, PhD., William Hyatt, Emile Franke, ASGA

Comments

From: Sherwood, David (Reuters) <dave.sherwood@thomsonreuters.com>
Sent: Friday, March 26, 2021 12:59 PM
To: Comments
Subject: [External] Striped Bass PID
Attachments: SherwoodAmendment7_32621.pdf

March 26, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

My name is David Sherwood. I am a Coast Guard licensed captain and fishing guide from Bowdoinham, Maine. More importantly, I am a father of two young children, ages 3 and 6. I am writing this letter on their behalf.

I caught my first striped bass on Bailey Island off the Maine coast and am fortunate to have spent the better part of my fishing life at a time when the species has been abundant. This is due to smart, forward-looking, and honest regulations that were implemented decades ago by the ASMFC to protect the fishery. These were visionaries who understood the importance of the task at hand – and their actions paid off for all of us.

Today, I fish in Maine, on the famed Kennebec, and I do so nearly every day of our 5-month season. My kids often join me. Sadly, their timing is poor. The data is now unequivocal: the quality of the fishery has declined dramatically in the past decade versus the one before it. The fish are far smaller, fewer, and farther between and age groups poorly distributed. Fisheries in storied striped bass habitat like Martha's Vineyard, Montauk and the Kennebec River are gravely diminished. No one I know was surprised when striped bass were declared overfished nearly two years ago. This has happened on ASMFC's watch.

Therefore, I believe the priority for ASMFC must be an immediate and comprehensive rebuilding plan – and that this plan should be incorporated into Amendment 7. Rebuilding must necessarily come before we discuss any overarching changes to the goals or objectives of striped bass management, biological reference points or biological/management triggers. Amendment 6 already requires that the stock be rebuilt within 10 years of being declared overfished – this is a top priority and must begin now if my children are to grow up enjoying the same robust striped bass fishery that we all did.

Rebuilding the stock to the levels and size distribution that we saw in the 1990's has the critical effect of bringing millions of new fishermen and women to the beaches and sea to fish for striped bass. A healthy fishery creates a virtuous cycle that is good for everyone – anglers, tackle shops, gas stations, grocery stores, beach communities, and critically, charter boat captains in places like Maryland and Virginia.

While short-term, some may feel the only way to keep their charter business afloat is to allow their clients the right to harvest an additional fish, or a smaller one, that of course will have the opposite effect in the long-term. Their clientele shrinks alongside the dwindling population of fish. ASMFC must protect us all against these tempting – but wrong-headed - pitfalls.

Increasingly over the years, we have seen the interest of the few placed above that of the majority – to the detriment of the striped bass fishery. Besides delaying on rebuilding the stock, new loopholes have emerged. Effectively immediately, we must purge "conservation equivalency" from striped bass management until we have a healthy robust population. This is not the time to be injecting additional uncertainty into the process.

Rebuilding the stock and size distribution of striped bass to 1990s levels, and putting the resource first in every decision will, in the long-term, benefit us all. This is the thinking that created what has for decades been one of the most popular fisheries in the United States, and this is the thinking that we demand of the ASMFC today.

Make no mistake: A generation of young fishermen and women are depending on the decisions you make. They are looking to you for leadership.

Please do what is right for striped bass so my children can enjoy them as you and I once did.

Sincerely,

David Sherwood

49 Bay View Lane

Bowdoinham, Maine

Dfsherwood207@gmail.com

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Comments

From: Richard E. Strzepek <basshook@optonline.net>
Sent: Friday, March 26, 2021 12:37 AM
To: Comments
Subject: [External] Striped Bass PID
Attachments: Amendment-7-PID-Comments_ASGA_Final.pdf

Emilie Franke, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board

As a 73 year old surfcaster born in Rhode Island now living on Long Island, NY I have been surfcasting for striped bass since 12 years old - 61 years. I have lived through good fishing years and very poor fishing years. I lived through the Moratorium and experienced the rebound in the striped bass stock to experience some wonderful fishing.

I implore the Management Board to do everything in its power to ensure a robust and sustainable striped bass fishery. I acknowledge that there are many complex factors which must be considered.

I have carefully read the American Saltwater Guides Association comments submitted on March 5, 2021 to the Board. I believe their comments are presented with comprehensive documentation and present thoughtful and respectful discussion of these issues. I therefore have included a copy of their comment letter and ask that it be considered part of my comments.

As someone who is a licensed Professional Engineer that worked in the environmental regulatory field for 36 years one thing is certain, without adequate and quality data and robust detailed statistical analysis no valid conclusions can be determined. There needs to be a concerted effort to initiate improved and comprehensive data collection from as many reputable sources as possible.

Thank you for your consideration of my comments and I hope this Amendment effort will lead to a stable and vibrant striped bass population for my children and grandchildren to enjoy the fishing I love.

Richard E Strzepek, P.E. <{{{><

Comments

From: Rob Lee <renegadesea27@gmail.com>
Sent: Thursday, March 25, 2021 9:00 AM
To: Comments
Subject: [External] My comments from yesterday's Connecticut ASMFC meeting: March 24, 2021
Attachments: Top points for CT meeting 3_24_2021.pdf

Good morning ASMFC staff,

I wanted to start by sharing my appreciation for your patience, participation, and professionalism that you exhibited in what at times were a hostile audience that did not focus on the merits and accomplishments of the ASMFC, but rather the challenges and complications that the ASMFC faces in our mutual quest to protect our fisheries including our valued striped bass.

I wanted to provide the highlights of my comments from yesterday's Connecticut meeting where I was a participant. I have added some additional points of view that I may not have spoken on yesterday.

I am attaching my comments in a pdf and also incorporating here. Additionally, not in this email but in my attachment are some notes that I took from participation comments.

CT meeting, 59 attendees.

Justin Davis DEEP., admin commissioner of ASMFC.

Interstate Fisheries Management Program

Emily Franke: ASMFC, Fishery Management Plan coordinator

Toni Kerns: ASMFC Director of oversight & policy development

I would like to start by Thanking you Atlantic States Marine Fisheries Commission and staff for your best efforts and putting together these public meetings. I know that oftentimes you are bearing the brunt of some of the frustrations regarding these issues, so I thank you for your patience in allowing me to share my comments and thoughts.

I am Robert Lee, a recreational fisherman based in Connecticut, fishing CT, NY & RI. I am a member of both the Westport Striped Bass Club and the Connecticut Surfcasters Association and I am not speaking on their behalf as the opinions and comments are my own.

I would like to talk on 5 areas that I will cover in short order to allow others to participate.

Key Points: Goals & Objectives **

- I believe that the current goal and objectives of the Atlantic Striped Bass Fishery Management Plan continue to be appropriate for striped bass management.

- ***Key Points: Biological Reference Points *****

- We should not change the current 1995 reference year that is currently used.

Key Points: Stock Rebuilding Target and Schedule**

- I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained at a minimum with a desire for more aggressive rebuilding.

- *We should not be managing for yield/harvest, we should be managing for abundance, this may include more aggressive and proactive changes including shorter timelines for corrective action.*

- I believe that rebuilding the stock quickly over incremental changes over time to gradually rebuild the stock.

Key Points: Management Program Equivalency (Conservation Equivalency)**

- *I am against Conservation Equivalency.*
- We should manage the striped bass fishery on a coastwide basis and not allow states to deviate from the coastwide standard.

Key Points: Recreational Release Mortality

I believe we should move minimum size limit, Move slot from 28-36 to higher size such as 32" – 36" might help.

We need to manage for abundance and help by reducing recreational release mortality. Some examples that may help our striped bass include:

Increase public awareness and fish release information for safe fish release, bulletins at fishing tackle shops, marinas, fishing shore locations including beaches, places where people fish.

Regulation requiring crushing barbs on fishing lures helps reduce fish mortality due to faster/easier fish release.

Should striped bass targets remain in the overfished category, I am for additional effort controls (ie) time and area closures including limitations during spawning season to help reduce the number of trips interacting with striped bass. I agree with limiting winter fishing if needed, tough on the fish.

I like the idea mentioned by others of destinating the striped bass as a gamefish for additional protection.

Comments

From: George McAuliffe <george.mcauliffe@gmail.com>
Sent: Tuesday, March 09, 2021 10:39 PM
To: Comments; stripercomments@gmail.com; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] PID striped bass

To Whom It May Concern,

As a long-time recreational saltwater angler based in New York CIty and Sag Harbor, New York, I am writing to provide my input and feedback regarding the Amendment 7 PID.

Issue #1 - The current goals and objectives of the Striped Bass Management Plan should not be changed or amended. They are sensible and the result of a significant amount of discussion and debate, and should be preserved in their current form.

Issue #2 - The biological reference points also should not be altered. These reference points have been negotiated and widely agreed upon by the community, and changing them also negatively impacts our ability to achieve consistent, longitudinal analyses to inform our understanding of the health of the striped bass population.

Issue #3 - Similarly, I see no reasonable basis for changing management triggers, which have similarly been agreed upon and consistently applied, contributing to stability in the management of the fishery.

Issue #4 - For the same reasons, stock rebuilding requirements triggered by thresholds should not be changed.

Issue #6 - Finally, I do believe we should seek to finally put and end to so-called "conservation equivalency," which leads to inconsistent responses by Atlantic states to 1-4 above, complicating the ability to monitor the differential effect of conservation efforts by state, encouraging states and various stakeholders to find loopholes in the regulations, and also ignores the fact that striped bass are an anadromous, migratory species that often travel great distances in a single season, and don't really pay attention to conservation measures on a state-by-state basis. Nor do anglers, frankly. This heterogeneity in conservation policy simply contributes to confusion, even amongst well-intentioned anglers. On a given weekend, I can find myself fishing for striped bass in three or four different states, and despite the fact that I pay close attention to striped bass conservation issues, even I'm not always sure what regulation to apply in all circumstances. Simplicity and clarity are critical - especially for recreational anglers who, we now know, account for 90% of the striped bass mortality rate.

Finally, as a migratory species, I feel strongly that striped bass should be Federally managed, with the same set of rules for all States – but that is a battle for another day.

I grew up in the 1970s and 1980s when catching a single striped bass in a season was a proud achievement. And we then had to live through a moratorium. The past few seasons - and last fall in particular - we have witnessed a heartening return of striped bass to our local nearshore waters. Rather than exploit this opportunity as we have in the past, we really need to apply the hard earned lessons from the past several decades to act as responsible stewards of this incredible fishery, lest our children grow up without experiencing its wonders once again.

Sincerely,

G.B. McAuliffe

-

Comments

From: Matthew Susca <msusca@springfieldcollege.edu>
Sent: Tuesday, March 09, 2021 7:41 PM
To: Comments
Subject: [External] Striped Bass PID

ASMFC,

My name is Matt Susca; an avid fly fisherman in New England and member of Fly Fisherman International. For as long as I can remember, my family has spoken of the hay-day of the striped bass. Decades ago where striped bass boasted both quality and quantity in our coastal waters. As I have seen, this is not the case. Per the urging of Stripers Forever and the American Saltwater Guides Association, I am reaching out to voice my concerns and feelings on striped bass management.

Issue 1: Goal (*"To perpetuate… migratory stocks of striped bass."*) is fine.

- Objective 4 (*"Foster quality and economically viable recreational, for-hire, and commercial fisheries."*): remove the commercial reference. Recreational anglers are the overwhelmingly dominant user both in terms of numbers of participants and economic impact. Managing for commercial interests runs counter to the greater public good.
- Objective 6 (*"Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures."*): Gamefish status would solve this.

Issue 2: SF's position is to maintain existing biological reference points (BRPs) since we know that the stock can attain those levels **as it has in the past.**
Issues 3 & 4: Management triggers & timeline (*"Up to ten years."*): Keep what is there and follow what they say should happen. Triggers were ignored after implementation in Amendment 6 and that is at least part of why the stocks are where they are today after 18 years of a ten-year plan. For Issue 4, SF's position is to rebuild the stocks, and maintain, sustain abundance, vs. manage for "maximum sustainable yield."
Issue 5: Regional Management is a good idea. Chesapeake Bay is the Striped Bass' primary nursery and should be managed differently than the coastal fishery should be different. In addition we are strongly recommending the adoption of **seasonal closures in spawning locations such as the Hudson River**. Striped Bass should be given the opportunity to spawn without human intervention. Closing the Hudson River, Ny Bight and Raritan Bay to Striped Bass Fishing in the spring would protect large females as they migrate from spawning grounds into their coastwide distribution. This is a no brainer and we believe it will dramatically protect and improve the spawning stock biomass. It won't be easy though, unless you have game fish status.
Issue 6: Conservation Equivalency should be status quo, but with consequences when states adopt CE measures that fail to achieve desired outcomes.
Issue 7: Recreational Release Mortality: The circle hook requirement is fine as implemented in *Addendum VI*. Treble hook use on artificial lures, and proper handling should be a continuing education process.
Issue 8: Recreational Accountability: Implementing recreational harvest limits (RHLs) will be a problem until the Marine Recreational Information Program (MRIP) is supplying timely and high confidence data.
Issue 9: Coastal Commercial Quota Allocation; The simplest answer is to make it a game fish. End of story. Harvesting juvenile fish in Chesapeake Bay and larger, breeder-size females along the coast runs counter to achieving management goals.
Issue 10: Other issues: "How would you like management of the Atlantic striped bass fishery to look in the future?" Stripers Forever stands by its mission: Make it a Game Fish.
Personally, I feel better education is paramount. I understand the matters of funding and marketing can assist in proper handling practices as well as easier access to "catch and keep" slot limits for recreational anglers. Here in New England, each coastal state has a slightly different distinction of a "keeper" and too many recreational anglers side on the side of ignorance rather than adhering to catch and release practices. Admittedly, striped bass should really not be kept and consumed due to the increasing information coming out regarding the run-off of high levels of mercury/contamination that striped bass carry in the internal organs from their time in the Chesapeake Bay area. As much as COVID-19 slowed the initial access to striped bass fishing, which some hoped would help the stock recover, upon opening of beaches and waters, recreational anglers with limited knowledge or education on proper handling and release practices. Better signage in coastal communities could be posted to spread the word on catch and release education.
Thank you for your time, should you wish for clarification on anything that I have mentioned, please feel free to reach out.

Matt Susca
Springfield College
MS Sport & Exercise Psychology
860-280-7863
"Civilize the mind but make savage the body"

Comments

From: Luyen Chou <luyen.chou@gmail.com>
Sent: Tuesday, March 09, 2021 7:01 PM
To: Comments
Cc: stripercomments@gmail.com; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] Striped Bass Management Plan Amendment 7 PID

To Whom It May Concern,

As a long-time recreational saltwater angler based in Brooklyn and East Hampton, New York, I am writing to provide my input and feedback regarding the Amendment 7 PID.

Issue #1 - The current goals and objectives of the Striped Bass Management Plan should not be changed or amended. They are sensible and the result of a significant amount of discussion and debate, and should be preserved in their current form.

Issue #2 - The biological reference points also should not be altered. These reference points have been negotiated and widely agreed upon by the community, and changing them also negatively impacts our ability to achieve consistent, longitudinal analyses to inform our understanding of the health of the striped bass population.

Issue #3 - Similarly, I see no reasonable basis for changing management triggers, which have similarly been agreed upon and consistently applied, contributing to stability in the management of the fishery.

Issue #4 - For the same reasons, stock rebuilding requirements triggered by thresholds should not be changed.

Issue #6 - Finally, I do believe we should seek to finally put and end to so-called "conservation equivalency," which leads to inconsistent responses by Atlantic states to 1-4 above, complicating the ability to monitor the differential effect of conservation efforts by state, encouraging states and various stakeholders to find loopholes in the regulations, and also ignores the fact that striped bass are an anadromous, migratory species that often travel great distances in a single season, and don't really pay attention to conservation measures on a state-by-state basis. Nor do anglers, frankly. This heterogeneity in conservation policy simply contributes to confusion, even amongst well-intentioned anglers. On a given weekend, I can find myself fishing for striped bass in three or four different states, and despite the fact that I pay close attention to striped bass conservation issues, even I'm not always sure what regulation to apply in all circumstances. Simplicity and clarity are critical - especially for recreational anglers who, we now know, account for 90% of the striped bass mortality rate.

I grew up in the 1970s and 1980s when catching a single striped bass in a season was a proud achievement. The past few seasons - and last fall in particular - we have witnessed a heartening return of striped bass to our local nearshore waters. Rather than exploit this opportunity as we have in the past, we really need to apply the hard earned lessons from the past several decades to act as responsible stewards of this incredible fishery, lest our children grow up without experiencing its wonders once again.

Sincerely,

Luyen Chou

Comments

From: Michael Dooley <ms.dooley10@gmail.com>
Sent: Tuesday, March 09, 2021 4:42 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass. I am a resident of Maine. Respectfully, I'd like to offer my comments as follows:

I believe that Issue 1 should be removed from consideration in this amendment, as the goals and objectives are not the problem. Rather the problem at hand is ASMFC's lack of adherence to previously established goals and objectives.

On the subject of Issue 2, I believe that 1995 is an appropriate reference year and recommend that the Biological Reference Points remain unchanged, and that this issue be removed from further consideration in Amendment 7. I believe that the lack of ability to maintain a healthy striper stock **is not an appropriate or justifiable reason for changing our goals**.

On the subject of Issue 3, Management Triggers, I believe that Triggers 1-4 are appropriate, though I believe that Trigger 5 should be revisited in order to confirm whether it is an appropriate enough indicator of recruitment failure.

I vehemently believe that the 10 year rebuilding timeline in Amendment 6 should be maintained. This is essential to the health of the fishery. I am also strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7.

I believe that Issue 5, Regional Management, should be removed from Amendment 7.

States that choose to implement conservation equivalency, as in Issue 6, should be held accountable should their regulations fail to meet the stated conservation objectives.

On the topic of recreational accountability, I have several thoughts that I believe to be both reasonable and productive for the health of the fishery:

- A $25 striped bass fishing stamp requirement would do great things for the funding of MRIP coastwide, and would help the ASMFC and the public make more informed decisions going forward through the resulting better data
- Require a maximum of one treble hook per artificial lure
- Require all barbs to be flattened
- Stronger punishments for poaching-> I believe counting this against the commercial quota + fines and a lifetime ban from holding a saltwater fishing license would be prudent reactions to the abuse of an otherwise fragile fishery.

Thank you for the time and consideration in this matter,

Mike Dooley

Comments

From: Paul Richards <striper239@gmail.com>
Sent: Tuesday, March 09, 2021 2:44 PM
To: Comments
Subject: [External] Striped Bass PID

My comments on the PID are simple and straightforward but they assume that the ASMFC actually wants to conserve/protect stripers.

I was an AFS Certified Fisheries Scientist for about 20 yrs and participated in the NEPA process (as an applicant and regulator) on many occasions.

It is my hope that the species is the focus of this process and not solely the commercial or recreational entities. Once the "tipping point" has been reached, no practical "recovery" is likely to be successful for stripers. You decide.

!) Hook and line only coupled with catch and release
2) Barbless or circle hooks only

Florida tarpon are doing well without harvest (or even full removal from the water for hero pics)
Bonefish, permit and tarpon are thriving in Belize due a catch and release strategy enacted countrywide.

Please protect/conserve these magnificent fish.

Paul Richards
Cape Cod, MA

Comments

From: Doyle, Jim <jim.doyle@exac.com>
Sent: Tuesday, March 09, 2021 1:24 PM
To: Comments
Subject: [External] Striped Bass Conservation at the highest level support

I feel obligated to write, and have had enough experience that, I feel justified to share my opinion on the protection of the striped bass species.

When I was 15, my Dad took a classmate and I to Island Beach State Park, NJ and sat in the car for 8 hours while we walked the beach in the cold windy rain of October, casting for Stripers on my first saltwater surf fishing trip ever. I had no idea what I was doing and still managed 3 of the largest fish I ever caught albeit bluefish. I was hooked, pun intended! Through the last 46 years I have spent more time and money pursuing this passion with the Striped Bass, than I would admit to my wife, but I am sure it is in the 6 figure realm. Annually, with life long friends I visit the NE USA for 2or more weeks of vacation, spending thousands a year trying to cure my Striper fever during another fall run. I calculate my eventual demise by the years between right now and meeting my maker. Hoping that I will be able to fish every year before that inevitable day. Without getting to preachy, I buy gear, tackle, rental homes, rental cars, food, gas, and all other condiments that go along with the passion quest, to hunt, photograph, and release Striped Bass. I have kept only a few to eat in my lifetime.

I have 3 sons of which 2 are currently following the genetic code malfunction I've given them as they become fisherman not catchers and keepers. I am sad to witness the massacre at the Cape Cod Canal every summer on another trip we have started for the past 6 years. Finally, I would share one man's opinion representing the dozens of acquaintances I've fished with over the years. Keeping no Striped Bass ever would be fine with us to have the chance of lifting a trophy (over 30") at night in the surf, taking a photo, and watching her swim back to the ocean to create another 300,000 to 600,000 eggs for the next years stock so that others post our leaving this great earth would have the experience to enjoy landing the quarry that we hunt and see the fruits of our labor come to fruition in honoring this great game fish.

Respectfully,

Jim

James R. Doyle
Commercial Director, Hip
Principal Engineer

Exactech, Inc.
2320 NW 66th Ct.
Gainesville, FL 32653

Office: 800.392.2832
Mobile: 352.262.9516
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Comments

From: Rock and Sand Charters Captain Aaron <rockandsandcharters@gmail.com>
Sent: Tuesday, March 09, 2021 12:12 PM
To: Comments; Patrick Keliher; Stephen Train; Sen. Dave Miramant; Megan Ware; Rep. JAY MCCREIGHT
Cc: stripercomments@gmail.com
Subject: [External] Comments on Amendment 7 PID

March 9, 2021

To whom it may concern,

My name is Aaron Landry. I am the owner of Rock and Sand Charter Company in Portland, Maine. I have fished Casco Bay since the mid 80's and later for Stripers since the mid 90's. In that time I have seen the fishery rebound and decline and am very concerned that we are repeating the mistakes of the past by implementing policies that operate under the assumption that all is well with the fishery.

In comparison to the late 90's and early 2000's the fishery in Southern Maine is a shadow of itself. Fish are both smaller and in less abundance. This is caused - in my opinion - by poor management. Fish that migrate to Maine from the Chesapeake face a hodgepodge of regulations that seem to serve the interests of small groups of fisherman within each state. As a result there is no overarching philosophy/ strategy so it is difficult to determine what management techniques are successful and what factors are affecting the population.

Last year it seemed that the development of a coast wide strategy (with important exceptions) would finally address the fragmented regulations. Without waiting to see the results of the changes we are back here - discussing changing and amending without any data.

As such, I am strongly opposed to several aspects of Amendment 7. I oppose changing the SSB. The fact that we have not been able to reach targets with current management strategies is not an excuse to change the target. I remember fishing in the 90's and I am sure that anyone on the coast would exchange that fishery with the one we have now. The management strategies that resulted in the state of the population should be implemented now - rather that changing the goalposts

I am opposed to both increasing regional control and allowing CE's as they increase the management strategies. Many of these strategies are not intended to increase abundance and size of fish coast wide - but rather to allow local interests to maximize their share of the resource.

I am a fly and light tackle guide. I strictly practice catch and release. I try to minimize my impact on the fishery as much as possible. I have little sympathy for commercial fisherman, charter boat captains, recreational fisherman, or otherwise - who would place their own interests ahead of the health of the fishery as it is a short sighted approach that, unmitigated, will lead to the collapse of the population.

Thank you for your time,

Aaron Landry
Rock and Sand Charters Portland, Maine

Comments

From: Jim Simms <simmsonthecape@gmail.com>
Sent: Tuesday, March 09, 2021 11:09 AM
To: Comments
Cc: Dan Mckiernan
Subject: [External] Striped Bass Amendment 7 Commnents

Thank you for the opportunity to comment on the PID. I have been an avid striped bass fisherman for the past 25 years, and have seen a robust population in the 1990s dwindle to an overfished species without a robust plan to rebuild the stock.

The following are my comments on the major issues:

Biological Reference Points: The reference year of 1995 is appropriate. Using another year without scientific validation would be purely arbitrary.

Stock Rebuilding and Target Schedule: The 10 year rebuilding timeline as outlined in Amendment 6 should be retained. The rebuilding plan to support this timeline should be implemented immediately.

Conservation Equivalency: This approach should not be used when the stock is overfished, given the empirical evidence shown in some states that it doesn't work.. That is, if CE isused by omen states, there is no followup accountability.

Again, thank you for the opportunity to comment on this important issue. Let's abide by the science and implement enabling objective for a robust long term striped bass population. Short term catering to special interest groups will not rebuild the population.

Sincerely,

Jim Simms

Comments

From: Don LaRuffa, Jr. <dlaruffa@revisionenergy.com>
Sent: Tuesday, March 09, 2021 8:59 AM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello Striped Bass Board,

I'm a lifelong fisherman. So, at 48 years old, I'd say there's solid 40 years of being totally obsessed with fishing under my belt.

When I was a kid striped bass seemed to be a mythical creature based on the crash and recovery that was under way. It wasn't until I was in my 20's that I caught my first striper on a charter in VA.
Then I enjoyed the recovery in the early 2000's when schoolies were king and hearing of a 20#er was a big deal.

Between the lack of ability for the commercial fleet to land their reduced quota, coupled with a similar trend I used to hear Old-Timers before the crash of "lots of big fish and not a lot of small ones" ; it seems safe to say history may be repeating itself.

With that being said, please consider the following bullets my official position on the current Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather

premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE.

Thank you,
Don LaRuffa, Jr.

Comments

From: Barry Woods <barrytwoods@gmail.com>
Sent: Tuesday, March 09, 2021 8:57 AM
To: Comments; stripercomments@gmail.com
Cc: Patrick Keliher
Subject: [External] Striped Bass PID

Hello Striped Bass Board and Commissioner Keliher:
While I have used a form reply for the substantive issues being considered, I want to state that I am deeply concerned with the current management of Striper bass and implore the group to act forcefully to promote recovery of a healthier cross section of age classes and limit kill by commercial and recreational fishermen.

Last year commercial quotas in MA were not merry because there were no significant inside populations of bad over 35". I fished in MA of Cape Cod and saw two schools of fish that would qualify for that size. There were thousands of smaller fish, which could restore the population but for the current size limit allowances. I fear we continue to repeat the mistakes of the past.

Thanks for your time. Please consider the following bullets my official position on the current Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

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Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thanks, I hope for a rapid recovery of the striped bass population.

Sent from my iPhone

Comments

From: Dave Snyder <dave@halyardsrestaurant.com>
Sent: Tuesday, March 09, 2021 7:58 AM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello Striped Bass Board,

Thanks for your time. Please consider the following bullets my official position on the current Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific

Dave Snyder
Owner
Halyard Restaurant Group, Hook and Knife Charters
Cell - 912-399-3813; dave@halyardsrestaurant.com

Comments

From: Michael Lynch <mlynchmd@gmail.com>
Sent: Tuesday, March 09, 2021 5:42 AM
To: Comments
Cc: Cheri Patterson; Dennis Abbott; RITCHIE WHITE; dhw@cisunix.unh.edu
Subject: [External] Striped Bass PID

Dear members of the ASMFC and to the NH Commissioners Patterson, White, Watters and Proxy Abbott,

Thank you for the opportunity to make public comments at the hearing last evening. And thank you for all of the overall work you do to maintain the health of the US Atlantic fisheries.

Although the ASMFC is is charged with maintaining the health and sustainability of the Atlantic fisheries, it is really also charged with maintaining the health of the ecosystem. It is confusing at first, as a layperson, to work through the history of the the ASMFC to understand that it ultimately reports to the Department of Commerce. However, understanding that fisheries, and the Atlantic fishery in particular, were a vital part of the fabric of the history of the United States, from the very beginning, helps one to understand this relationship and reporting history.

With that relationship and charge in mind, you, as members of the ASMFC, are tasked with both maintaining sustainable fisheries and thus also a healthy ecosystem to sustain that fishery. We are at a tipping point in the health of Striped Bass. Numbers are declining, recruitment is low, the harvest, in this setting, is too high, and there is evidence of poor reproduction in the Chesapeake. In addition, there is evidence of a decline in the health of the fish in the Chesapeake itself. Many showing signs of starvation, with low fat levels and empty stomachs when samples are taken.

Of all of the issues that are on the table in this PID, #2, the Biologic Reference Points, is the most important issue that needs to be addressed. It is crucial that the current BRP's that are set off of the the 1995 numbers and corresponding BRP, be maintained. Any weakening of that number threatens the recovery of the Striped Bass population. We all, I believe, want this fishery to be vital for ourselves, our children and our children's children. We are at a tipping point in this issue, and there are too many proposals and questions on the table that cloud this most important issue. If we, if the ASMFC, adheres to the current BRP's and then responds to those numbers if they continue to decline, then we will also have to respond to the things that affect that BRP.

We must think of things as systems not silos. If we divide states and waters and the interconnectedness of the ecosystem, we, you, in your charge to maintain a sustainable fishery will fail. This interconnectedness does include more challenging issues for the ASMFC such as the fact that a single company, Omega Protein, is destroying the foundation of the Atlantic ecosystem by pulling juvenile menhaden out of the Chesapeake by the millions of tons, and reducing them to pellets and feed for pets and farm raised fish in other parts of the United States and in other countries. This "feed" should remain in its original ecosystem. The ASMFC cannot tackle this challenging issue and others like it without holding firm on the 1995 BRP's.

Thank you again for your time and work on this critical issue.

Sincerely,

Michael Lynch, MD
Concord, NH

Comments

From: Parker Mauck <pgmauck@gmail.com>
Sent: Monday, March 08, 2021 8:15 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane
Subject: [External] Striped Bass Amendment 7

To whom it may concern,

I am a charter captain from Westport Massachusetts. To start with, I would like to extend my appreciation to the members of the ASMFC for putting in their time and effort to preserve the Atlantic fisheries. I would like to make some general and some specific requests.

In general, I implore the Commissioners to take this and future opportunities to leave their legacy as the ones that saved the Striped Bass and other species, and not be remembered as the ones that allowed those species to end up as ruined. This is your time to really make a difference.

We have the information we need, the Striped Bass has been declared overfished and the 2019 and 2020 spawning years were terrible, so it is now time to make a few subtle sacrifices and exercise caution to save these incredibly valuable fish.

Specifically, and most importantly, do not alter the Biological Reference Points. Now is not the time to relax our evaluation criteria and allow more pressure on the Striped Bass. The focus of Amendment 7 should be on reducing fishing mortality, not lowering the standards managers use to determine the health of the fishery.

Conservation Equivalencies will encourage too much variation in the results we hope to achieve in shared waters. The ASMFC should be striving for simpler and consistent management, not individual plans. With each state introducing their own versions, the risk of exceeding the coastwide fishing mortality target is too high.

We should encourage and work to fund outreach programs to reduce fish mortality associated with fish releases in both the recreational and commercial sectors.

We must establish and follow through on accountability policies for the management of our fish. The 10-year stock rebuilding timeline should be maintained and followed. ***Say what we will do and do what what we say!***

I know it is not easy and you can't make everyone happy, but please take action to keep Striped Bass, Bluefish, Menhaden, and other fish populations truly healthy and abundant. We will all benefit.

Sincerely,
Captain Parker Mauck

Capt. Parker G. Mauck
pgmauck@gmail.com
(508) 496-8682
www.westportfly.com



Comments

From: Jim and Amy King <kings04@earthlink.net>
Sent: Monday, March 08, 2021 5:02 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] ASMFC- Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release. In addition, the recent action to ban J hooks and replace them with in-line circle hooks for bait fishing is long overdue. However, the committee that emplaced this edict exhibited a woeful misunderstanding of certain fishing methods, including them in the ban. e.g.- tube and worming and bucktail jigging with a pork rind attached. This suggests lack of understanding of the fisheries/techniques they are trying to manage and casts doubts on their decision making process and expertise

Respectfully,

Jim King
Tiverton, RI.


Virus-free. www.avast.com

Comments

From: Paul Whitcomb <paulwhitcomb1@comcast.net>
Sent: Monday, March 08, 2021 5:20 PM
To: Comments
Subject: [External] Re: March 9 Striped Bass Virtual Public Hearing

Hello,

I do not know whether this comment falls within the parameters of any of the topics you will be discussing regarding Striped Bass management, but I would like to strongly recommend that monitors be put in place to detect any nuclear discharge from ships being built at Bath Iron Works. As we know, the ship(s) being built there are nuclear-powered and that the federal government may allows a certain amount of release into the water. The Kennebec hatchery is just too rare and valuable to jeopardize by not being vigilant.

On a separate note, I would like to know your opinion on the possibility of removing Brunswick Dam (and replacing with wind or tidal energy projects). The stripers do chase the bait fish up to the dam each May, but the effect of the dam on the water quality is profound, in that there is little-if-any oxygen in the water below the dam, making it an extremely unhealthy environment for the fish and any near-by wildlife.

Thank you,

Paul Whitcomb

Comments

From: Robert Antonucci <bobantonucci1@gmail.com>
Sent: Monday, March 08, 2021 1:49 PM
To: Comments
Subject: [External] Striped Bass PID

I AM 80 yrs old. I've been Striper fishing for over 65 years, both from the beach and on the water.
I would be opposed to any moratorium on Striper fishing by recreational fishermen/women. Politics aside, the most productive method to preserve the species for the long term is to address and mitigate the damage RESULTING FROM COMMERCIAL FISHING. PERIOD..!
A study of Economic Aspects of Allocating Striped Bass among competing Groups in Virginia revealed that the recreational fisher contributes 5x to 6x times more revenue to their economy vs Commercial fishers.
When you compare this finding with the population impact caused by commercial fishers , it should be intuitively obvious to the most casual observer that restricting Striper fishing to recreational status is the most effective approach to saving and enhancing the Striper population.

--
Bob Antonucci
978-808-4616

Comments

From: Mario & Olga <lamona543@gmail.com>
Sent: Monday, March 08, 2021 1:45 PM
To: Comments
Subject: [External] Striped Bass PID

During my many years of striped bass fishing the worst damage to the fishery that I have observed is done by fisherman catching, injuring and releasing as many as thirty fish in one day. A limit to how many fish can be caught and release should be established to prevent this. The argument against such a rule is that it is not enforceable but the point is most fishermen will adhere to the rule without much enforcement. There is precedent to show that fear of being watched as one breaks a rule is enough of a deterrent. Even if only half of the people fishing limit their catch and release to lets say a five fish limit it would be an immense help to the striped bass population.

Mario D. Fernandez
11 Burnside st.
Nashua, NH 03064
(603)882-8455

Comments

From: Charles H Anderson Iii <gandfish@aol.com>
Sent: Monday, March 08, 2021 11:06 AM
To: Comments
Subject: [External] Declining game fish stocks in the Pamlico sound area

To whom it may concern,

I have been fishing the Pamlico sound and it's tributaries for 15+ years
Based on the fishing early in these 15 years
I purchased land and built a house on Pungo Creek - retired here from Virginia 3 years ago
Based on the thought that intelligent people from the state fisheries would do the right thing to protect the resource..
It has not happened? I don't understand how these supposed intelligent people can't see the dire straights we are in, it is not the recreational anglers causing this in my humble opinion.
People are allowed to rape the bottom of the the sound by YOU allowing trawling inside of the sound! How is this not seen or understood?
What other states allow bottom trawling in breeding estuaries?
Please wake up and do the right thing or soon we will have a dead sound

C. Anderson
1013 Winfield Ln
Pinetown, NC 27865

Sent from the all new Aol app for iOS

Comments

From: Patrick Hilbert <patrick@outdoorseast.com>
Sent: Monday, March 08, 2021 10:32 AM
To: Comments
Subject: [External] ASMFC hearing, public comment

I am an obsessed striped bass fisherman in southern Maine. I strongly oppose any change to: #2 biological reference points.
The current biomass reference points are based on verifiable observation and represent the best science currently available.
The focus of Amendment #7 should be to reduce fishing mortality not lowering the standards managers use to determine the health of the fishery.
Thank you for your time.
Patrick Hilbert

Comments

From: William Barrett <wdb.lmk@gmail.com>
Sent: Monday, March 08, 2021 10:24 AM
To: Comments
Cc: Dan Mckiernan; Raymond Kane
Subject: [External] please protect these fish

Dear ASMFC-

As a citizen and voter, I am urging you to pass measures to conserve the striped bass population. I can't believe the generous catch and keep limits that exist and think we are heading down the road of steady decline. Please give these fish a chance and impose more strict regulations

Regards,

Bill Barrett

Comments

From: Keith Bobrowiecki <Keith.Bobrowiecki@rheinmetall-us.com>
Sent: Monday, March 08, 2021 10:16 AM
To: Comments
Subject: [External] Striped Bass regulation comments

Good day,

As a lifelong striped bass fisherman who spends more than 100 days per year pursuing these gamefish and feel that these fish are overfished and not properly managed based on my year over year catch data.

1. Designate Striped Bass as a gamefish and end the commercial harvest of these fish in all eastern states. This suggestion is for saltwater variants. Commercial harvest of freshwater (landlocked) may be feasible but I do not know.
2. Establish a 1 fish per angler retention limit and set the minimum length at 36". This worked VERY well in the northeast back in the 80s and early 90s when the fish were last on the brink.
3. Circle hook requirement for all live bait with the exception of tube and worm when trolling.
4. Banning of all treble hooks when fishing in areas that striped bass may be present. It is not hard to change over from trebles to singles on plugs and a prohibition would drive manufacturers to supply single hoks as an option on new equipment.

Best regards,

Keith Bobrowiecki
Operations Manager
Business Unit Integrated Electronic Solutions
American Rheinmetall Systems, LLC
15 Morin Street
Biddeford, Maine 04005, USA
Direct: +1 207 571 5872
Mobile: +1 207 292 9070
Keith.bobrowiecki@rheinmetall-us.com
www.rheinmetall-defence.com





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Comments

From: William Hoyerman <whoyerman@gmail.com>
Sent: Monday, March 08, 2021 10:01 AM
To: Comments
Subject: [External] Striped Bass PID

Hello Board,

I have fished the area all my life, recreationally, it is a large part of my life and I understand the ASMFC has a draft amendment out for public review.

Here are my thoughts based on each "Issue":

1. Fishery Goals and Objectives

The goal is good the science is bad, I am not sure the problem with the science but all data shows stocks are way down they are not perpetuated – in any way. That is undeniable. I believe in a three to five year moratorium on killing any striped bass. Alternatives (e.g. tags) will allow people to play games and require too much enforcement.

Don't believe the commercial guys they just want the tax right off on the expenses. 99.9% don't need the income they just like the excuse we are giving them. Real commercial fishermen don't target striped bass.

2. Biological Reference Points

In this you state *"…. the last four benchmark stock assessments for striped bass (2002, 2007, 2013, and 2018 benchmarks) which demonstrate how the Commission's understanding of stock condition in 1995 has changed over time."*

And then after discussing the scientific methods you go one to state the problem:

"Statement of the Problem: It's approaching two decades since the 1995 estimate of female SSB was selected as the basis for BRPs for striped bass. However, improved data and advancements in assessment modeling have changed our understanding of historical stock performance since the stock was declared restored. This is an appropriate time to revisit the BRPs to ensure they are reliable indicators of stock performance and are properly aligned with the FMP's goal and objectives."

A.k.a we don't understand it, old science did not work and we continue to see a decline in stocks.

The board states that female spawning stock biomass (SSB) have never been met. That is not "an unreasonably high management target given current objects for fishery performance" and then default to climate change. Female SSB has been below SSB Threshold since 20133 according to your graph.

Yes, the science is not all there, I am a scientist and sometimes we just have to admit "we don't know", that is what makes science work. Please understand that the species is worth more alive than dead. Pretend like it is 1988 and no one has killed a bass in years; give it 5-years for the science to better understand, please stop letting these fish be overfished.

3. Management Triggers

Wake up you are the "management" we are there

4. Stock Rebuilding Targets and Schedule

The science is not there. Yet! Just stop killing them stop making excuses based on flawed science. Schedule is now – please.

5. Regional Management

We are just figuring out the different stocks, stop killing them and let it rebuild so the science can catch up. We will never understand the various stocks with the decline we are seeing. The fishery should be managed regionally not by state.

6. Management Program Equivalency (Conservation Equivalency)

"The Atlantic Striped Bass FMP (and Commission's ISFMP Charter) employs CE to provide states and jurisdictions (hereafter states) flexibility to develop alternative regulations that achieve the same quantified level of conservation for the resource as the FMP standards. Allowing states to tailor their management programs in this way avoids the unequal impacts that result from implementing one set of management measures for all states." This has failed miserably and need I reiterate because we don't understand the species (note you will kill the species off if you think of them a Stock!)

7. Recreational Release Mortality

Circle hooks are good. If we go to catch and release the release mortality will plummet. People looking for dinner, or commercial cash, don't care about mortality.

8. Recreational Accountability

Good luck keep it simple, all catch and release for 5-years

9. Coastal Commercial Allocation

STOP IT

10. Any other issues concerning the management of Atlantic striped bass

Yes! We should do whatever we can to restore their ecosystems. License fees would be a good source of money for that.

I appreciate the opportunity to speak my mind and ask you to live up to your responsibility, save the species

Thank You

Bill

William R. Hoyerman, LSP

direct 774.409.2711 **office** 774.501.2176 **mobile** 781.799.9506

Comments

From: Thomas J. Butters <butters@buttersbrazilian.com>
Sent: Monday, March 08, 2021 10:01 AM
To: Comments
Subject: [External] Strippers

There should be a 5 year catch and release, single, barbless hook program. No baitfishing. Thanks

Sent from my iPhone

Comments

From: ANTHONY SAMMATARO <acsammataro@snet.net>
Sent: Monday, March 08, 2021 9:15 AM
To: Comments
Subject: [External] Striped Bass Regulations

This morning I was greeted by an article in the paper describing possible Striped Bass legislation changes in 2022. The discussion involving a ten year moratorium on recreational fishing is quite disturbing considering last year a slot limit was imposed and this year circle hook use with natural baits was imposed. I'm no marine biologist but I'm 69 years old and have fished for bass a long time and in no way is this fishery worst than it was in 86 when it was closed. Let's face it we are all in favor of preserving this valuable resource. First thing we need to do is look at is history. When the fishery opened after the moratorium a 36 inch one fish limit was imposed. The length was later dropped to 34 inch one fish. This really seemed to work. It worked so well the size was dropped to 28 inch 2 fish. Bad idea. That eventually led us to where we are now the worst idea yet the slot limit. This legislation I feel could wipe out the fishery. Last year showed an amazing amount of school fish, more than I've seen in some time. If we protect this group I feel the fishery will be fine. But to do that we must abolish the slot as this group will swim right into it! We need to go back to the 36 inch limit. Understand that the larger fish are without question the hardest size for the recreational angler to catch. Now I'm sure your shaking your head but hear me out. Now on top of the 36 inch one fish one caveat, make all natural baits illegal. That's right the easiest way to catch a cow is live bait plus mortality rate is high because of gut hooks no matter the style of hook used.
I believe this type of fishery legislation makes perfect sense. I pin hooked bass until 85, later became a charter boat captain and still dabble in that business. I speak from what I see and believe this approach is not selfish to any one organization, business, or CLUB and will produce a fishery all anglers will appreciate.

Thank you,
Captain Tony Sammataro

Comments

From: Greenleaf Garrison <greenleafgarrison@gmail.com>
Sent: Monday, March 08, 2021 8:45 AM
To: Comments
Subject: [External] Striped Bass PID

Good morning,
The below are what I believe to be the most reasonable and progressive way to handle the population of striped bass we have left.

- 10 year Moratorium on all harvest
- Seasonal closures in spawning grounds
- Ban the commercial gillnet fishery
- Stronger punishments for poaching

I am not sure why the anglers who speak out continue to be ignored by the ASMFC. The striped bass are in serious trouble. If those interested in harvest continue to be placed ahead of science and the fish it is based on we will lose this resource.

--
M. Greenleaf Garrison, MA, CFP®
Plug LAB Cape Cod
508-367-1960

Comments

From: Michele Snitkin <msnitkin@earthlink.net>
Sent: Monday, March 08, 2021 8:23 AM
To: Comments
Subject: [External] 10 year Striper Ban

I endorse the 10 year Striper Ban on commercial and recreational fishing in order to preserve the species. I fished for my favorite fish, striped bass, with my Dad off the Milford, CT, beaches as a child and it is still a favorite fish but I have stopped consuming it since the number of fish is dwindling. It is worth the wait to have a robust supply in a decade!
I congratulate you on your pro-active stance.
Sincerely,
Michele Snitkin

Comments

From: robert young <robyoung33@yahoo.com>
Sent: Monday, March 08, 2021 8:07 AM
To: Comments; Cheri Patterson
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 comments

Striped Bass Conservation

Dear Ms Patterson,

Thank you for your long-standing civil service to our wonderful state of New Hampshire. I am writing to you as a concerned citizen regarding the current state of the striped bass population and the role we all play ensuring its survival. I have been following the public meetings regarding Amendment 7 and feel it is important to voice my concern on several sections being reviewed.

First and foremost, I believe it is critical for all parties involved to be heard such that we can build a comprehensive and effective plan which will ultimately lead to a sustainable, viable, and robust population of striped bass.

As a 21 year veteran in the US Air Force Special Operations Command, I learned many lessons, but one which remains a cornerstone to my time is: I never asked anyone to perform a task I wasn't willing to do myself. As a recreational angler who loves to fly fish for these amazing gamefish, I can't sit back and expect other anglers to raise concerns unless I'm willing to do so as well.

I have three main areas I would like to address regarding Amendment 7.

First, I have a position on issue 2 regarding biological reference points. I have read the current literature and referenced the studies presented and feel strongly that the 1995 reference point be instituted (kept) as the benchmark towards achieving the stated goal of restoring the fishery to 125 percent of the 1995 spawning stock biomass.

Second, I have a strong position towards issue 5 in regards to regional management. I believe the overall focus needs to be centered around rebuilding the stock of striped bass along the entire eastern seaboard. A comprehensive and sensible, unified approach is key. Dividing regulations across individual states or regions makes little sense and is detrimental to the overall objective of rebuilding striped bass stocks for everyone's benefit.

Third, I maintain a strident stance on issue 6 - Management Program Equivalency. I am very concerned about the risks involved, when implemented, with conservation equivalency as there is no measurement for accountability. What procedure is followed to ensure enforcement? Moreover, who is accountable when benchmarks are not achieved? It is my position that issue 6 be tabled until updated studies can validate striped bass are not being overfished.

I would like to finish by expressing my deep gratitude for your time and for the opportunity for me to voice my concerns.

Best,

Robert Young
Stratham, NH

Comments

From: Vincent Bongiorni <vab@vab-law.com>
Sent: Monday, March 08, 2021 7:51 AM
To: Comments
Subject: [External] FMP for Atlantic Striped Bass

The current regulations are not robust enough to end overfishing.
I witnessed the rebound in the 80's when the stock crashed and the fishery was closed. When it reopened it was one fish 36" or better and the stock rebounded, as soon as it was amended to 2 fish 28" or better the stock began to decline steadily. The failure to prevent the overfishing of Atlantic Menhaden didn't help
There should be another 5 year moratorium where striped bass fishing should be catch and release only with single barbless hooks. Continuing to employ short term fixes designed to pander to various factions that compete for these stocks is useless, your first allegiance should be to protecting the future of the fishery, not industry politics.

Comments

From: Kevin Kelly <AllAmericanAlienBoy@hotmail.com>
Sent: Monday, March 08, 2021 7:50 AM
To: Comments
Subject: [External] striper moratorium

I agree with the group Stripers Forever on a 10-year moratorium on keeping striped bass. I've been striper fishing since the early 80's and the number of stripers has been going down the whole time. Something must be done now.

Kevin Kelly
57 Crescent Ave
Niantic, CT 06357

Comments

From: Marc Quenzer <mquenzer690@gmail.com>
Sent: Sunday, March 07, 2021 10:14 PM
To: Comments
Subject: [External] PID Amendment 7

I'm am writing this as a concerned angler who want to see the best for our striped bass population. I think point #2 two about the biological threshold should stay where it's is. That were the stick was at a healthy level and we should strive for that. Secondly I would like to see the removal of point #6 Conservation Equivalency. With the slot we are basically targeting our future spawning year classes. Lastly I think we should push to protect spawning areas. By that I mean not fishing on the Susquehanna flats, Delaware river and Hudson in the spring. I would also like to see places like the Chesapeake bay, Delaware bay and the Raratin bay have catch and release fishery put on the until may 20th. We need to protect these fish before they lay there eggs and we don't and we wonder why the population is going down.

Comments

From: Mimo Emo <mimoemo@gmail.com>
Sent: Sunday, March 07, 2021 7:58 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments

There should be a high slot limit for striped bass - i am no scientist but I would like to see a slot that allows recreational anglers to take 1 fish from 36 - 40 inches and that is it.

In reality, to rebuild the stock the best course would be to have a moratorium on the taking of striped bass.

And given the value generated by striped bass, for towns and tackle shops and guides and local restaurants, the smartest thing to do would be to declare the striped bass a gamefish and be done with it. The fish is too valuable to eat - and in my view is not so amazingly tasty that people really have to eat it. You want to eat a fish? Eat a blackfish.

Look at how trout are managed. Trout Management Areas (if they are properly policed and managed) have an incredible density of quality fish that anglers will travel a long way to fish for. That spells T O U R I S M dollars.

And states should not have their own rules for striped bass. The fish doesn't respect state lines and neither should the regulations. Why should people in the Chesapeake be able to kill a bunch of small fish that anglers in other states release so that they can grow big and replenish the stock? It makes no sense.

While I am at it, how about just having people enforce the rules that are made. Enforcement is 100% of the law. Nobody enforces jaywalking laws in NYC because it is no longer considered to be such a big deal. Hence everyone jaywalks right in front of police officers. So how about the current regulations for striped bass? Poaching is endemic. Any angler can show you who the poachers are - the regulars at locations across the whole range of striped bass know who the poachers are. And when you catch them, do me a favor and give them a penalty that actually hurts - like confiscating their boat and/or tackle. If that happens to just ONE poacher once, the rest will perk up their ears and maybe decide it isn't worth the risk.

Thanks for reading this far. Ask any long-time striped bass angler and he or she will tell you that the fish are ebbing away. My fishery is a shadow of what it once was. Please bring it back - doing so will power economic growth in towns along the eastern seaboard; doing so is not just good business - it is the right thing to do.

Best,

Eric

Comments

From: Ryan Hollibaugh <ryanhollibaugh@gmail.com>
Sent: Sunday, March 07, 2021 5:32 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

To whom it may concern,

I have only recently moved to the Northeast, though I have been an avid angler for many years now. One of the aspects of this move I was most excited about was the opportunity to pursue striped bass in and around my new home. I have been very much dismayed of late by the reports of decreasing stocks size and decreasing opportunity for angling.

While mortality due to recreational catch-and-release is, to some extent, unavoidable due to the nature of angling, and is at present a large driver of bass mortality, this can be dramatically reduced relatively easily. Angler education on proper catch and release methods must be a priority for the commission going forward. I am certain they will find enthusiastic partners in this effort amongst all sectors of the angling community.

-Ryan Hollibaugh

Comments

From: Dave Prockop <dprockop@groton.org>
Sent: Sunday, March 07, 2021 12:17 PM
To: Comments
Cc: KURT BLANCHARD; Jason E. Mcnamee; DAVID BORDEN; Sen. Susan Sosnowski; Nicole Lengyel Costa; Eric Reid
Subject: [External] Striped Bass Amendment 7 Comment

Dear bass managers,

As an avid recreational fisherman, I have been dismayed to see the decline in the striped bass population over recent years. Although I understand that there are legitimate reasons, and pressures on you, to allow as much harvesting as possible, I strongly urge you to err on the side of caution so that our beloved bass population can return to much higher numbers and be maintained there over time.

The bass population appears to continue to be very fragile, since only a few particular years of fish show promising numbers. Regulations affecting fish of a particular age will therefore have a huge impact on the population as a whole.

Towards that end, I support the comments submitted by the ASGA. Those I see as most critical are:

- Keeping 1995 as the reference year for biological reference points
- Continuing to use the management triggers from Amendment 6
- Continuing to use a 10-year rebuilding timeline

With thanks for your careful management of our beloved striped bass,

Dave Prockop
Providence, RI

Comments

From: Michael Lynch <mlynchmd@gmail.com>
Sent: Sunday, March 07, 2021 9:51 AM
To: Comments; Cheri Patterson; dhw@cisunix.unh.edu; Dennis Abbott; RITCHIE WHITE
Subject: [External] Striped Bass PID

Dear Commissioners Patterson, White, Watters and Proxy Abbott,

First of all, thank you for all of the work you do in helping to manage and maintain a healthy fishery and ecosystem in NH and more broadly on the East Coast of the United States.

This is a critical time in the history of the striped bass fishery in the United States. If we decide to weaken the existing Biologic Reference Points beyond the current floor of stock levels, which is based on good data, we will threaten the current declining levels of striped bass even further. If this were to occur, stopped bass populations will decline and would take decades to recover, if even then, as the cycle of overfishing of menhaden, which is currently harming the population of juvenile striped bass in the Chesapeake, could have permanent harm.

Please use your voice and influence to support the current Biologic Reference Points. Any undermining of that current threshold would have profound and possibly permanent effects for the fishery.

Thank you for your time and consideration and support of this position.

Sincerely,

Michael Lynch, MD
Concord, NH

Comments

From: fisharts@comcast.net
Sent: Sunday, March 07, 2021 9:11 AM
To: Comments
Subject: [External] Striped Bass Amendment 7 comments

I would like to make my voice heard on the impending consideration and vote on Amendment 7 to the Interstate Fishery Management Plan for Striped Bass:

The striped bass fishery is incredibly important to the recreational fishing industry and the ecology of East Coast inshore waters. Therefore, I urge fishery managers to take a conservative approach to the fishery and act towards rebuilding the stock to healthy levels on as swift a timeline as possible, even if this results in greater restrictions on recreational fishermen.

Goals/Objectives: I believe that the current goals and objectives for the striped bass fishery are sufficient, and recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Biological Reference Points: I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Stock Rebuilding & Target Schedule: I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Thank you for your consideration.

Sincerely

Tom Richardson
93 Aucoot Rd.
Mattapoisett, MA 02739

Comments

From: Donald Milora <ildhangr@yahoo.com>
Sent: Sunday, March 07, 2021 6:04 AM
To: Comments
Subject: [External] Striper comments (For ENTIRE East Coast).

1) Ban commercial harvest.

2) Ban trolling.

3) Ban harvesting from fresh water.

4) Ban harvesting of fish greater than 32".

5) Keep in place a bonus tag system. Eliminate the provision, however, that allows charter captains to give a tag to their guests. That policy is absolutely absurd!

6) Allow 1 fish 26-30" harvest per boat. NO big cows (females) landed!

7) Read striper forums like Bass Barn and get input from older people that actually fish! Bucktail Willie comes to mind. He has been advocating changes for over 15 years to anyone that will listen.

A MORATORIUM ELIMINATES AN ENTIRE AGE GROUP OF YOUTH FROM PROPERLY LEARNING HOW TO FISH FOR STRIPER. It is unfair to them and then creates the same situation when the moratorium is lifted that we had in the 90s and 2000s. Scarcity and new rules will manage the stock without eliminating the recreational fishery.

Donald Milora
Ventnor, NJ
609-231-5555

Comments

From: Norm Staunton <norm.staunton@gmail.com>
Sent: Saturday, March 06, 2021 10:16 AM
To: Comments
Cc: Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT; GAIL WIPPELHAUSER; David Pecci; BOB HUMPHREY
Subject: [External] Striped Bass PID

Greetings to the ASMFC.
Thank you for this opportunity to comment on the Striped Bass PID.
For reference, I am strictly a recreational striped bass fisherman. I live in Vermont but own property and a boat in Maine and regularly fish NH, Massachusetts, and Rhode Island from shore, wading, surfcasting, kayak, and powerboat by spin and fly. I have a Captains License (which I do not use for charter or commercial fishing) and have been fishing for Stripers since I was a child growing up on Narragansett Bay. I would imagine that my economic contribution as a direct result of Striper fishing is around $10k annually.
As far as the PID goes, I have the following suggestions/comments.
Issue 1: I support an end to Commercial Striper fishing and would suggest that the commercial wording be removed from this section. Recreational anglers are the overwhelmingly largest group of Striper fisherman in all metrics: catch, harvest, and economic impact. I support changing the status of Stripers to a game fish and managing it, in perpetuity as such. I support an end to any gill-netting or harvest other than hook and line.
Further, please don't misunderstand. I have worked in commercial fishing. I am a huge supporter of commercial fishing and working waterfronts and the traditions they embody. My concern over commercial Striper harvesting has to do with the market and the viability of the fishery. If commercial status cannot be eliminated, I would be in favor of significantly reducing the commercial harvest to favor only those fisherman that are truly making a living by fishing stripers, requiring that those commercial licenses be granted only to residents of the issuing state, requiring all commercial fisherman to hold MMC/Captains Licenses and run under commercial insurance. Under this system, the quota could be dramatically reduced, and should be managed as a fixed annual quota (staring in January to take advantage of hold over fish and higher market prices) or a transferable tag system managed similarly.
Issue 2: I am in favor of maintaining existing BRPs.
Issues 3 and 4: In my opinion, the existing triggers are okay, but they must be followed. Trigger points should not be ignored or they do no good towards rebuilding stocks, sustaining abundance and managing for maximum SUSTAINABLE yield, which should be the only management goals.
Issue 5: I am in favor of regional management with some deference to individual states in implementation and regulation. For example, nursery locations deserve to be managed differently than migratory locations, and spawning grounds should be closed by each state Appropriate, regional management allows for fair but not equal treatment of each region based on the goal of re-growing the stock and developing a sustainable stock from which to harvest. Spawning and nursery grounds in particular need protection.
Issue 6: I am against Conservation Equivalency. In concept, I support it, but in practice it has proven to be a failure, particularly in light of the lack of penalties when adopted CE measures fail to achieve the outcomes required. If CE, in concert with my comments on Issue 5, actually achieved the breeding stock and population goals I would support it.
Issue 7: I support circle hook requirements and the use of single treble hooks on artificial lures. However, I also think that a greater number of recreational fish mortalities are a result of poor handling of fish, not gut or foul hooking, and support any measures to not only educate the public on proper handling, "Keep Em Wet", and hook removal, but also penalties or education requirements on that front. I think a rule to change to barbless hooks should also be considered, but I am not sure we know enough about the consequences of this potential regulation to implement it yet. I also believe that if Recreational release mortality is metric used in management of the fishery, so should Commercial release mortality, including bycatch and poaching, or a full data set on mortalities, harvest, and full impact will remain unknown.
Issue 8: I support Recreational Harvest Limits, but the information coming from the MRIP is not timely or sufficient to fullly implement them. I would support a full moratorium on Striper Harvests for some set amount of time, perhaps 10 years, to allow the population to rebound while still capitalizing on the economic benefits of the fishery. I am not a fan of the slot limit, largely because of the small, pre-breeding sizes allowed to be harvested- my understanding is that breeding doesn't usually occur until a fish reaches 26" or 28". Neither am I fan of harvesting of larger fish (30", 36", or 40") because while these fish have been given the opportunity to breed, they also breed at significantly higher rates and are genetically pre-disposed to large size. If a moratorium cannot be enacted, I would support a shift to a much higher, and narrower, slot limit, possibly in the 28"-32" range. If a moratorium on harvest cannot be put into place, I would support a tag system for any recreational harvest to ensure good data and to financially support conservation efforts.
Issue 9: As stated previously, I support the end of Commercial harvest, or major changes to the Commercial Quota and rules as explained above. I support Game Fish status, and think that harvesting juveniles in the south and breeder females along the entire migratory route needs to end.
Issue 10: In short, I support Game Fish Status for Stipers. I support a full moratorium on harvest at all. End or radically change commercial harvest, and regulate the entire fishery towards the one and only meaningful goal: a vibrant, economically important, sustainable breeding game fishery. I am in favor of stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).

Thank you for your time in considering my comments. Striper fishing is very much a part of my history, lifestyle, and discretionary spending. I have seen the depletion of the stock in my lifetime and support any and all effective measures to rebuild the stock for future generations. I would hate to see the traditions that have been so important to my life be lost to over-harvesting and greed.
Sincerely,
Norm Staunton

--

Splash More. Bark Less.

Comments

From: billsjovall <billsjovall@optonline.net>
Sent: Saturday, March 06, 2021 9:02 AM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC,

Please consider making the striped bass a protected gamefish for at least the next decade, if not permanently. No recreational or commercial harvesting until the stock is restored. Catch and release only, barbless hooks, no treble hooks, barbless circle hooks for bait. Ban gill netting in striped bass waters to minimize bycatch destruction.

The Bahamas has protected bonefish and tarpon for many years, that has sustained their guide and tourist business. This same protection should be offered the striped bass until it is once again plentiful.

Failing the above measures, the recreational limit should be one bass per day 27"-31". Commercial quota should be hook and line only and cut in half from present levels.

Thank you for your consideration.

Bill Sjovall
Morristown, NJ

Comments

From: rich rubin <docrubin@hotmail.com>
Sent: Saturday, March 06, 2021 8:23 AM
To: Comments
Subject: [External] Striped Bass regulations

I have been surf fishing since the 1980s and have seen the rise and now the fall of the stripe bass catch. This has been especially obvious while fishing from shore. The one cause that you can control is the amount of harvest of stripe bass and its forage baits especially menhaden. While a total moratorium would be ideal, a limited one would help the population. In addition I support the Striper Forever recommendations:

- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for striped bass.

Thank you,
Richard Rubin

Good health is true wealth

Comments

From: JULIE HERRING <jrherring2004@gmail.com>
Sent: Friday, March 05, 2021 11:16 PM
To: Comments
Subject: [External] CORRUPT WHITE PEOPLE

LOOKS LIKE THERE IS NO DIVERSITY IN THIS GROUP, MAYBE IF THERE WAS YOU WOULD PROTECT THE ESTUARIES WHICH OUR FISH THRIVE IN. INSTEAD OF LINING YOUR POCKETS. THAT IS MY OPINION…….LET'S SEE WHAT CAN BE DONE ABOUT THAT…….

Comments

From: Tyler DeFrese <tydef@optonline.net>
Sent: Friday, March 05, 2021 7:10 PM
To: Comments
Subject: [External] Striped Bass PID

I'm writing today to issue my concerns with the striped bass population. I've worked in a tackle shop on the East End of Long Island for 5 years now and have seen an obvious drop in the amount of striped bass being caught and an even larger drop in the amount of big fish caught. It's unacceptable. We need a moratorium implemented desperately. This fish is too important to decimate for no good reason.

Please listen to those of us who reach out to share our concerns as we are the ones who most likely spend the most time targeting these fish and have witnessed the population get lower and lower.

A moratorium is the only option.

Sincerely,
A concerned fisherman

Comments

From: Dennis Beauchene <dbeauche@maine.rr.com>
Sent: Friday, March 05, 2021 6:33 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom It May Concern;

Please consider the protection of Striped Bass. The dollar value of a thriving biomass available to recreational anglers greatly outweighs their commercial value.

Thank you for your consideration of this request.

Dennis Beauchene
Cape Neddick, ME

Comments

From: Ned Bean <ned_bean@milton.edu>
Sent: Friday, March 05, 2021 5:40 PM
To: Comments
Subject: [External] Striped Bass PID

Good Afternoon Friends,
I hope you and your families are well. I have been a surfcaster on Martha's Vineyard for 53 years. In my youth, almost any evening fishing outing was going to be rewarded with multiple landings of stripers and one to harvest for the dinner table. Yes, population size in the fishery has a a cyclical nature, but the trend in the striped bass fishery was a significant decline from 1967 to the moratorium in the 80's. responsible sanctions during the moratorium resulted in a much healthier, more abundant striped bass fishery in the years following the moratorium. By 2012 the striped bass fishery was again in significant decline. Regardless of how you parse the data, to the fisherman out on the beach it's harder to catch a decent size striped bass because there are not as many fish present and all the large fish are basically gone. There is no fall run any more. The big tournament, the Martha's Vineyard Striped Bass and Bluefish Derby, does not include striped bass any longer. Having fished that tournament over several years, the fish landed are less abundant and consistently smaller than the striped bass we caught and landed in the 1960's-2010. Many fishermen have quit surfcasting, because it's just not worth it any more. This results in a decline in business at local tackle shops, with local guides and closure of fish markets. So, failure to properly manage the striped bass fishery has lead us to our current status with respect to the striped bass fishery. While I support additional restrictions to better support sustainability in the striped bass populations, anything short of a moratorium is a half-measure that will not be effective. The ASMFC has failed to enforce their own stated guidelines for striped bass management, arbitrarily lowered the goalposts to justify the "alternate reality" that the striped bass fishery is stable and healthy. If the ASFMC record of job performance demonstrated consistent, effective conservation practices to rebuild the fishery and the SSB, that would be one thing. It's time to close the fishery for five years for starters. Following the closure, it's time to restructure the ASMFC so that the tail that wags the dog is strong science, not anecdotal information of inferred benchmarks without empirical data. Climate change is real, and it will impact the striped bass in ways we cannot correctly predict. This is yet again another significant reason to close the striped bass fishery for five years while scientists do a full study and assessment of the striped bass fishery. No more half measures, period.

Sincerely,

John E. Bean
89 Pine Street #435
Edgartown, MA 02539

Sent from Mail for Windows 10

Comments

From: Charles Lee <ccleethree@gmail.com>
Sent: Friday, March 05, 2021 5:30 PM
To: Comments
Subject: [External] Striped Bass

Folks

I am a life long striped bass fisherman, living in Maine. In addition to Maine, I regularly fish for bass in the waters of Maryland, New Jersey, New York and Massachusetts.

I strongly oppose any changes to the biological reference points. The current biomass reference points are based on verifiable observation and represent the best science available today. The focus of Amendment 7 should be to reduce fishing mortality, not to lower the standards used by managers to assess the health of the fishery.

Thank you.

Charlie Lee
47 Winslow Homer Rd
Scarborough, ME 04074

Comments

From: Michael Lynch <dynomik88@yahoo.com>
Sent: Friday, March 05, 2021 4:43 PM
To: Comments; stripercomments@gmail.com; KURT BLANCHARD; Jason E. Mcnamee; Nicole Lengyel Costa; Eric Reid
Subject: [External] Striped Bass Amendment 7

To whom it may concern,

As a long time striped bass angler these issues are paramount to me and many others who share the same affinity for these fish. I've listed the proper course of action I believe necessary to replenish our striped bass stocks, which are in trouble. The lack of striped bass has been noted from countless anglers over the last few years. The amount of fish (especially breeding size stock fish) is extremely low.

Issue 1- I believe that that this issue should be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I reccomend the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Comments

From: Tom Doyle <tdoyle1551@gmail.com>
Sent: Friday, March 05, 2021 3:21 PM
To: Comments
Subject: [External] Striped Bass PID

Please consider protecting the Striped Bass from harvest to allow the stock to rebuild once again.
We have been down this road before and saw how a moratorium brought back a healthy and abundant stock of Striped Bass.
The lack of fish in most locales (particularly breeding size) is very concerning. Shore and boat fisherman alike are having to travel farther and farther to find smaller isolated schools of fish.
I support a moratorium on the harvest of Striped Bass both commercial and recreational to allow the stocks to rebuild.
thank you,

Tom Doyle
Dalton, MA 01229

Comments

From: Tom Fuda <tom.fuda@gmail.com>
Sent: Friday, March 05, 2021 3:16 PM
To: Justin Davis; William Hyatt; ROBERT LAFRANCE; Sen. Craig A. Miner; Comments
Subject: [External] Striped Bass PID - Comments on Issues 5 through 10

To the ASMFC Striped Bass Management Board,

Previously, I had provided comments regarding issues 1 through 4 in the ASMFC Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass (the FMP). Today, I am following up with additional comments on the remaining issues (5 through 10) of the PID.

Regarding Issue #5 (Regional Management):

I don't feel that the Chesapeake Bay region should be managed separately from the ocean region. Given that the vast majority of migratory striped bass come from Chesapeake Bay, it is not appropriate to manage it as a separate stock. The science on managing striped bass as distinct stocks is in its infancy. I don't feel that moving toward regional management of striped bass stocks should be part of Amendment 7. Striped bass move… they don't stay in one region reliably enough to be managed as separate stocks.

Regarding Issue #6 (Conservation Equivalency)

I feel that Conservation Equivalency has been misapplied and abused too many times in the past. Case in point, CE measures granted the state of Maryland in Addendum IV to the Amendment 6 FMP resulted in significant overharvest on the large 2011 year class of striped bass, which is probably one of the biggest factors in the decline in SSB over the last 10 years. Then again, last year, NJ used CE to adopt a different slot limit from the rest of the coast (28-38 vs 28 - 35). So now, fish in the 35 - 38 inch range that are protected in other state waters are subject to harvest in NJ waters. Similarly, MD proposed CE measures that used a mix of seasonal and regional closures and different size limits that will make estimating whether their CE measures produced an equivalent level of conservation a difficult task. The Technical Committee indicated the overall effect of these CE measures implemented by NJ and MD reduced the likelihood of meeting the recommended 18% coastwide reduction in harvest called out in Addendum VI in 2019 from 50% to 42%. Given the uncertainty of the effectiveness of CE measures, I feel CE should NOT be allowed while the fishery is in overfished status, and is experiencing overfishing, as it is now. CE is a tool that should only be used by managers once the stock has been rebuilt, and overfishing reigned in. At this time, we need more deterministic, consistent management regulations throughout the region in order to reduce the level uncertainty in management decisions. Also, allowing CE measures without corresponding recreational accountability measures is basically a "license to steal".

Regarding Issue #7 (Release Mortality):

As a fisherman that practices catch & release fishing pretty much exclusively, I am very sensitive to the fact that release mortality makes up a large portion of overall striped bass mortality. I fish both fly and spin gear with artificial lures. I fish a lot and have done quite a bit of experimentation with hook configuration on my artificial lures in an effort to reduce injury and handling time. I know there has been talk of banning treble hooks and requiring the use of dual, in-line single hooks on artificial lures. I disagree with this idea. In fact, I have found rigging my lure with one treble hook on the belly hanger of the lure has a much lower risk of deep hooking a fish than dual in-line single hook configuration. In my experience, having two separate hooks on the lure is a major cause of injury. When a fish takes the lure tail-on, the tail hook will often be swallowed deep into the fish's mouth, causing damage to gills and profuse bleeding. Conversely, if the fish takes the lure head on or from the side, the belly hook will set, but the tail hook will swing around causing damage to the fish's eyes, frequently blinding them in one eye. Another problem with dual, in-line single hooks is that in most cases, the

single hooks have a much wider gap between the hook point and the hook shank than treble hooks. I've personally seen cases where the wide gap of the single hook resulted in the hook point entering through a fish's mouth and exiting the eye socket. I have found that the single treble hook on the belly hanger rarely (I can almost say never) gets lodged deep in the fish's mouth. It almost always lodges in the outer part of the fish's mouth, and there's no loose, second hook swinging around to damage eyes. Having said this, I realize this is a difficult thing to regulate. Artificial lures almost always come from the manufacturer with at least 2 treble hooks. I think the only way to reasonably regulate this would be to adopt a regulation that limits the total number of "hook points" on an artificial lure to no more than 4 (or even 3). This way a fisherman could comply with regulations by removing one of the existing treble hooks on a brand new lure, and would not have to go out and purchase in-line single hooks to re-arm their lures. This would make it easy to regulate. If an enforcement officer saw a fisherman using a lure armed with two treble hooks, he could tell that fisherman he must remove one of the trebles on the spot, in order to keep fishing, rather than tell that fisherman he must stop fishing, go to nearest tackle shop and purchase in-line single hooks and then re-arm his lures before he can resume fishing.

Aside from this, fishery managers might consider the idea of seasonal closures during the warmest times of the year, since release mortality is known to be higher as air and water temps rise, and dissolved oxygen levels decrease. Also, I know the state of CT has a pretty robust fishery for winter hold-over fish. I feel this is another source of high release mortality. Basically, we've got a population of captive fish that receive heavy fishing pressure during a time when they are struggling to survive the winter on a much more limited food supply. I would like to see a seasonal closure during the winter months, say from December 15 through March 15. I realize there may be no scientific justification for this, since I don't believe there have been any studies done to quantify release mortality in extreme cold conditions. To me it seems like common sense that the fish need a break from fishing pressure during winter in order to have the best chance of surviving until spring.

Having said all this, recreational release mortality is only one contributing factor to overall fishing mortality. Fishing mortality needs to be reduced across the board in order to rebuild this fishery. The ASMFC cannot look solely at cutting release mortality as the silver bullet to rebuilding the stock.

Regarding Issue #8 (Recreational Accountability):

I am strongly in favor of incorporating recreational accountability measures into the FMP. I feel the ASMFC should adopt accountability measures similar to what are used in federally managed fisheries as mandated by the Magnuson Stevens Fishery Management Act. This would require implementing recreational harvest limits and pound for pound paybacks for overages. This is especially needed as long as Conservation Equivalency is part of the FMP. No Conservation Equivalency measures should be approved without some form of accountability measures to hold states accountable when a poorly crafted CE measure results in overages in mortality.

Regarding Issue #9 (Coastal Commercial Quota Allocation):

I feel that commercial striped bass quotas should be set annually, based on the most recently stock assessment.

Regarding Issue #10 (Other Issues):

Amendment 7 should include a rebuilding plan that has at least a 50% chance of rebuilding the stock to CURRENT SSB target levels within 10 years. Nothing in Amendment 7 should relax this requirement. Also, now is NOT the time for "management stability". Now is the time for management action. The most recent abundant year class was the 2015 year class. Fish from the class of 2015 are about to enter the current 28 - 35 inch slot size. Unless the ASMFC acts now to change the size limit again, the 2015 year class will be decimated over the next few years. These fish offer the best hope of rebuilding the fishery to target levels within 10 years.

Back in the 80s, when the stock collapsed, the ASMFC took bold action in Amendment 3 to the Interstate FMP. Amendment 3 required states to "institute size limits to stay ahead of the 1982 year class growth rate". These

efforts proved to be a resounding success. The SSB biomass soared through the late 80s and early 90s to the point where the stock was declared rebuilt in 1995. While I don't think we're at "moratorium" SSB levels, it is on a similar trajectory. The ASMFC should act now to repeat what led to the successful restoration of the stock back in the late 80s and early 90s; that is, protect an abundant year class.

One of the other issues the fishery faces is the lack of enforcement of regulations that are currently on the books. I know this is a difficult thing to incorporate into an interstate management plan, since it is highly dependent on each state's willingness to fund enforcement. But, just recently on one of the CT fishing groups I follow on social media the topic of poaching and illegal snagging of undersized striped bass in one of CT's rivers was a hot topic of discussion. Many fishermen commented on the fact they too have witnessed poaching, and contacted the Connecticut Department of Energy and Environmental Protection (DEEP) enforcement hotline to report the incident (I myself have done so). Due to the small number of enforcement officers in the state, they either arrived on the scene too late, or were never even dispatched. Amendment 7 should at least have some provisions intended to try to adequately fund law enforcement efforts.

Respectfully,
Tom Fuda
Shelton, CT
203-209-7195

Comments

From: Sean Tracey <sean@seantracey.com>
Sent: Friday, March 05, 2021 3:02 PM
To: Comments; Dennis Abbott; DWHITE@comcast.net
Subject: [External] Striped Bass PID

Dear Commissioners and Board Members:

I am a long time Striped Bass recreational fisherman. I remember in Cape Cod in the 1960s when there were no stripers caught, hardly ever. I now live and fish in Portsmouth NH area and have enjoyed (most years) a better striper fishing record and experience, and treating friends and family (with fishing licenses, of course) to the thrill of catching a stiper.

There should be NO COMMERCIAL HARVEST of striped bass for at least 10 years.
Spawning Areas should be closed during spawning season.
Have very strong punishments for poaching.
No barbs on hooks when targeting stripers, and NO Treble hooks.

We must protect this valuable fishery for our future and our kids'.
Thanks,
Sean Tracey
24 Johnson Court
Portsmouth, NH 03801
--
Sean Tracey
email: sean@seantracey.com

p 603/427-2800
visit us: seantracey.com
like us: facebook
follow us: twitter
videos: youtube

address:
401 State Street, Suite 3
Portsmouth, NH 03801

Comments

From: Skiddy von Stade <skiddyvs@gmail.com>
Sent: Friday, March 05, 2021 1:52 PM
To: Comments
Cc: Skiddy von Stade
Subject: [External] Striped Bass PID

To whom it may concern;

"I am an avid striped bass fisherman who lives in Maine. I strongly oppose any change to the biological reference points.
The current biomass reference points are based on verifiable observation and represent the best science currently available.
The focus of Amendment 7 should be to reduce fishing mortality not lowering the standards managers use to determine the health of the fishery."
Thank you for your consideration.
Skiddy von Stade

Skiddy von Stade
Partner
Uncommon Denominator
WeWork 12 East 49th Street
New York, NY 10017
917-689-7198 (c)

www.uncommonvc.com

Sent from my iPhone
Sent from my iPhone

Comments

From: Ogden White <ogdenwhite3@gmail.com>
Sent: Friday, March 05, 2021 10:47 AM
To: Comments
Subject: [External] Striped Bass PID

I have enjoyed fishing for Striped Bass in Maine and Massachusetts for decades, so I've experienced firsthand both decline and recovery, and sadly experience decline once again. I am terribly dismayed that we appear to be repeating mistakes of the past, and feel very strongly that we need robust management for this fishery. Of crucial importance in the near term is that we NOT change the Biological Reference Points. Weakening the Biological Reference Points could only be to the detriment of the striped bass population.

Thank you for your consideration.

Ogden White
ogdenwhite3@gmail.com
(617) 413-8244

Comments

From: Evan Dintaman <edintaman@gmail.com>
Sent: Thursday, March 04, 2021 5:43 PM
To: Comments
Cc: MICHAEL LUISI
Subject: [External] Striped Bass PID

Good Afternoon,

I am writing to comment on the Striped Bass PID for Amendment 7.

I am a lifelong angler who cares deeply about the striped bass fishery. I live in Maryland, but fish for striped bass in VA, DC, MD, NJ, and NY. This is a very special species to me and many of my angling friends.

As a fisherman, I am very concerned about the state of the striped bass fishery and even more concerned about the management of the fishery over the last decade. As a Marylander, I am embarrassed by MD DNR and their gross negligence when it comes to managing the striped bass who live and spawn in the Chesapeake Bay. I am copying Michael Luisi to this email and hope he is paying attention to the historic impact that the MD DNR will have on this fishery (either negatively - as it is currently - or positively, if they take a leap-of-faith and decide to do what is right to protect the species now and moving forward).

My comments are as follows:

- The Biological Reference points (Issue 2) should remain as current, with 1995 serving as the threshold. The reference points should not be changed or negotiated as part of Amendment 7. This issue should be removed from Amendment 7 and not up for debate.
- Stock rebuilding targets and timelines should remain aggressive. 10 years (2029) should be the maximum timeline considered. We cannot lose time in rebuilding this fish stock. A strong striped bass stock benefits everyone and brings economic value to all coastal states.
- Conservation equivalency should be eliminated entirely. If not eliminated, it should at least be disallowed until the stock is considered re-built. If allowed following rebuilding, states who use conservation equivalency should face steep consequences if their equivalency plans do not meet benchmarks.
- ALL large breeding fish MUST be protected by proposed regulations during the rebuild (and ideally moving forward). This includes eliminating the trophy season in Maryland. How Maryland still allows harvest of breeding fish on their spawning run is beyond me. This (among other management decisions) are an embarrassment to Maryland anglers like myself.

Thank you for your time,
Evan

Comments

From: ken meadows <kenandmeadows1@gmail.com>
Sent: Thursday, March 04, 2021 2:21 PM
To: Comments
Subject: [External] striped bass

one common law for the good of the fish on the entire east coast

Comments

From: kbrady@everyactioncustom.com on behalf of Kristyn Brady <kbrady@everyactioncustom.com>
Sent: Thursday, March 04, 2021 7:59 AM
To: Comments
Subject: [External] Striped Bass PID

Dear Fishery Management Plan Coordinator Emilie Franke,

As a recreational angler, I thank you for working to build a sustainable Atlantic Striped Bass population. This fishery is critically important to the economy up and down the coast.

As you consider Amendment 7, I have some concerns about your recommended management plan. Most importantly, we oppose any changes to the biological reference points. Now is not the time to move the goalposts, especially when there was no stock assessment done in 2020, and all other data indicates the stripers are in decline.

The focus of Amendment 7 should be to reduce fishing mortality, not lowering the standards managers use to determine the health of the fishery.

I know how important this decision is and I want to thank you for taking time to hear the concerns of the recreational fishing community.

Sincerely,
Kristyn Brady
Bristol, VT 05443
kbrady@trcp.org

Comments

From: L Manning <leo_manning@hotmail.com>
Sent: Thursday, March 04, 2021 12:20 AM
To: Comments; Patrick Paquette; Douglas M. Amorello
Subject: [External] Public Comments on Striped Bass in Massachusetts in 2020

I would like to offer a couple of data points on the poor striper fishing.

Early Sept 2020
Took charter on the Stray Cat out of Hyannis to Chatham Rips. Zero hits of any kind of fish. Not the fault of the captain as this was our 4th trip over the years. In past years we always got limits of nice sized stripers. Cost of stripers in a Hyannis fish market that day was around $32/ pound and they sold the last one to customer in front of me. Seems very pricey. Not sure how commercial guys are doing, but it seems that the underlying price would be motivating.

Late Sept 2020
Cuz charters out of Plymouth
One barely legal striper and one cod.
This was our first trip on this boat.

Not a good investment of $1600+. Fishing was not like it was in the past. The canal seemed slower than usual as well.

Comments

From: marneebanks@everyactioncustom.com on behalf of Marnee Banks <marneebanks@everyactioncustom.com>
Sent: Wednesday, March 03, 2021 10:03 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Fishery Management Plan Coordinator Emilie Franke,

As a recreational angler, I thank you for working to build a sustainable Atlantic Striped Bass population. This fishery is critically important to the economy up and down the coast.

As you consider Amendment 7, I have some concerns about your recommended management plan. Most importantly, we oppose any changes to the biological reference points. Now is not the time to move the goalposts, especially when there was no stock assessment done in 2020, and all other data indicates the stripers are in decline.

The focus of Amendment 7 should be to reduce fishing mortality, not lowering the standards managers use to determine the health of the fishery.

I know how important this decision is and I want to thank you for taking time to hear the concerns of the recreational fishing community.

Sincerely,
Marnee Banks
Washington, DC 20002
marneebanks@gmail.com

Comments

From: John Papciak <jpapciak@optonline.net>
Sent: Wednesday, March 03, 2021 8:11 AM
To: Comments
Cc: JOHN G. MCMURRAY; James Gilmore; Emerson Hasbrouck; Sen. TODD KAMINSKY
Subject: [External] Striped Bass Amendment 7 PID

Subject: Public Information Document for Atlantic Striped Bass Amendment 7 for Public Comment

Dear Commissioners and Staff,

This is essentially a follow-up letter to provide additional input on the management of striped bass. The last time I provided feedback like this was in 2019. I can't help but think back to the ASMFC call of October 30, 2019 when our public feedback was discussed. I remember New York's James Gilmore commenting on how public input clearly showed support 'up and down the coast' for a larger striped bass size (1@35) over all the other management options being offered. The public acknowledged that a larger size worked, and the fishery recovered. Gilmore's comments came just before the Commissioners went ahead with their own agenda anyway, and pushed through something entirely different, a slot size. There is a long-standing pattern here, of collecting such public input - and then disregarding it. This makes it increasingly harder to spend more time today providing comments to the ASMFC. It should not come as a surprise if public input on such matters continues to decline.

As I see it, the problem goes way beyond providing input to a specific document here. ASMFC is facing a vote of no-confidence from the public.

It is understood ASMFC is not legally bound to the management and legal standards that one might expect within the Regional Fisheries Management Councils. There appears to be little appetite to bring this body up to that type of a standard. Instead, we see Commissioners regularly looking to exploit loopholes in management plans (in the name of 'flexibility'), and ignoring stock assessments. This only delays or defers rebuilding plans. A strong case can be made that the Commision should cease moving forward with any new Management Plans. Instead, it should be completely restructured to work more like a Council, or be absorbed by a Council in the name of regulatory streamlining.

This Public Information Document (PID) for Amendment 7 is a hastily prepared paper which appears to draw attention away from significant administrative failures with the execution of the current Striped Bass Management Plan. The stock is now overfished, yet there are no 'Lessons Learned' being shared here. There are no credible studies to guide the public in understanding any broad new set of objectives. The reader is left wondering the motivation behind curious opening stenences ("the status and understanding of the striped bass stock and fishery has changed considerably which raises concern that the current management program no longer reflects current fishery needs and priorities"). It is highly unlikely the final product of this Amendment 7 proposal, as written, could ever drive the rebuilding of a stock that nearly everyone agrees is a shadow of it's former self.

It is not necessary to comment on every issue offered here, as so many fundamental flaws are carried throughout this proposal. Here are the most important items categorized by the Issues/Questions as outlined in the Amendment 7 PID document.

Issue 1 Fishery Goals and Objectives
Issue 2 Biological Reference Points

- Decisions on analytical and quantitative techniques for stock assessments should remain with qualified professionals. Commissioners with no training or background in population dynamics should recuse themselves from any such votes or discussions. We cannot have Commissioners or lobbyists with a political agenda further disrupting the development of tools which should only have one purpose - to conduct unbiased stock assessments.

- Qualified professionals should likewise have decision-making authority on reference points that support long term stability of the stock, bound by the same statistical certainty seen with other government regulatory mandates, with the ability to withstand successive years of low Young of Year (YOY), or problems with natural recruitment, as we are seeing now. Qualified fisheries professionals should further drive and own the decisions on the cost/benefit, and practicality, of tracking and managing regional sub-stocks of the same species, as long as it supports the above goal of long term stability of the entire stock. This is not open to debate for lobbyists to ponder.

Issue 3 Mangement Triggers
Issue 4 Rebuilding Periods and Schedule

- Discussions on management triggers and rebuilding timelines are curently irrelevant. The Commission is not adhereing to any such administrative procedure today. The Commission has repeatedly failed to follow its own management guidelines, and it has failed to take corrective action, even when specific projections repeatedly confirmed the stock was declining. How can the public comment on more action triggers and timetables, when this Commission has yet to follow it's own process? There is still no rebuilding timetable for Striped Bass! Instead, the Commission must revisit its own policies. It must seek new ways to offer the public assurances that it takes the job of managing a stock very seriously, and that such schedules are not open to 'flexibility' considerations. There must be consequences and paybacks if the Commission, the Commissioners or the individual states disrupt the execution of the plans to rebuild the stock.

ISSUE 6 Management Program Equivalency (Conservation Equivalency)
ISSUE 8: Accountability

- Conservation Equivalency and (lack of) Accountability continues to be used as a loophole to allow for greater local harvest, with no consequences for overages. Conservation Equivalency can never be implemented unless there are specific provisions for paybacks if the CE results in greater than anticipated harvests. CE should never be propsed unless scientists can reliably estimate the impact. Likewise, there should be paybacks for any overages, regardless of the sector.

ISSUE 7: Release Mortality

- Despite the glaring problem with decline in the stock, we still see The Commission entertaining a myriad of possible exceptions to things like circle hooks for bait. The Commission should only entertain exceptions once they have proven the stock is rebuilding and there are agreed timelines. It is depressing to hear anglers pleading for exceptions and exemptions when there is still no overall plan to rebuild. It is likely angler education plays a lead role in reducing mortality and each state should be required to implement an Angler Education Plan.

ISSUE 10: Other Issues

- Discussions on management plans or decisions that include ‘economic’ or ‘social’ considerations (or aims to introduce ‘flexibility’ to balance against biological goals) must be backed by actual data and relevant studies. The public is in no position to objectively weigh management alternatives that refer to ‘economic’ or ‘social’ considerations, if there are no reasonable estimates of the true impact to jobs and commerce. Commissioners cannot argue economics unless they have facts and details. “My constituents cannot take that kind of a hit,” is not a qualified economic assessment to argue against greatly needed harvest reductions.

In closing, it is very hard to watch the current situation and see ASMFC paralyzed, hoping to quickly pass a new plan with greatly reduced goals, to avoid further scrutiny. The Striped Bass stock is basically held together by one or two respectable year classes, yet the Commission continues to display no accountability and no sense of urgency. The Commission must show it can follow its own policies and management plans before asking the public for input on any questionable new endeavor.

John W Papciak
Montauk, NY

Thanks, John
516.647.0032

Comments

From: Mike Weeks <michaelsweeks@gmail.com>
Sent: Tuesday, March 02, 2021 2:02 PM
To: Comments
Subject: [External] Recreational striped bass fishing

Hello,,
I see many issue's with the striped bass fishing regulations and would love to offer my insight.
I see the people in charge obviously only looking out for the commercial fisherman slaying the stripers. Every year there are more and more limiting regulations put on us recreational fisherman and less on the commercial side.
The recent rule change was the most ridiculous of all . 36" maximum and only one fish !!! The 2 fish rule of over 28" 1 of which could be over 40 worked great and the fishery was just starting to thrive. We were actually MAYBE luucky enough to catch one fish but never two keepers. So excited trying to beat my Record fish of 42" . Now we are limited to only one fish and it cannot be over 36" . Yet , right next store , Massachusetts is allowed to catch and sell this by the pound and the commercial fisherman are using treble hooks snagging them , as the strippers are busting around schools of pogies. Claiming to be fishing for pogies but enjoying the easy stripper catch!
Us recreational fisherman just want to be able To go fish keep our 2 fish limit over 28 or 1 over 40 for our trophy fish . which by the way we mostly catch and release 20-26 around here .
I am discussed by the trawlers netting and killing all the tuna and stripers at our expense .
Thank you ,
Michael weeks
603-476-5158
P.O. Box 474 Moultonboro , NH . 03254

Comments

From: Brian B <bassatnite@hotmail.com>
Sent: Tuesday, March 02, 2021 12:35 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,
Regarding the striped bass management, it sure worked well back in the 1990's with 1 recreational fish at 36">, also with less fish being taken by commercial interests. The recreational fisherman want to catch and keep big fish for their ego. A circle hook mandate is excellent, but do the big bass survive after being released? Not all fisherman will handle those bass for optimal survival. They need haul it into the boat or onto the sand beach, pose for pictures, gawk at it, etc.

Captain Brian Bishop
Bayshore, NY 11706

Comments

From: Bradford Burns <bigbass@maine.rr.com>
Sent: Tuesday, March 02, 2021 9:30 AM
To: Comments
Subject: [External] Striped Bass PID

I followed striped bass management at the ASMFC quite carefully from the late 1970s until about 10 years ago, and I have followed it but less closely in recent years. In that time I saw the striped bass population crash, extreme restrictions put in place that allowed the population to recover, and then a series of liberalizations that combined with increased recreational participation have again reduced the stock.

When the population was near the top of its recovery we reopened commercial fisheries and increased the striped bass bag limit. The decision was made to use split reference points with a smaller one – 20 inches I think – for the Bay and 28 inches on the coasts. This was a bad decision to begin with, and it was a deal struck between Phil Coates of MA and Pete Jensen MD to optimize their shares of the size of fish preferred by their commercial fishing interests. This was bad because it put far too much pressure on large striped bass. That is what is now killing us. It was also unfair to coastal recreational anglers who contrary to Phil Coates' statements had always taken most of their harvest from among smaller striped bass. They have been unfairly locked out of this fishery from a harvest standpoint for 40 years.

We recognized that the spawning stock was shrinking well back in the relatively early 2000s, but the ASMFC did not have the will to really cut back when it was much easier. For 15 years now we have been a couple of steps behind the curve. Trying to adjust reference points and/or targets lower so that the ASMFC can hit them will just continue to drive this stock down the tubes.

At this point the best answer is to simply stop all harvest of striped bass until the stock recovers to a point substantially higher than right now. Liberalization of the harvest needs to lag behind stock expansion not be out in front of it. All commercial fishing for striped bass needs to end, but that is probably not an appropriate issue for the ASMFC to deal with.

Brad Burns
18 Merrill Rd.
Falmouth, ME 04105

bigbass@maine.rr.com

Comments

From: Emilie Franke
Sent: Friday, February 26, 2021 1:30 PM
To: Comments
Subject: FW: [External]

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: Vetcraft Sportfishing [mailto:vetcraft@aol.com]
Sent: Friday, February 26, 2021 1:20 PM
To: Emilie Franke <EFranke@asmfc.org>
Cc: Vetcraft Sportfishing <vetcraft@aol.com>
Subject: [External]

I think we are making a grave error in the way we manage our striped bass population. I further think we need to amend the SCAA to allow for the changes I am going to suggest.

Background: I have fished the Cape May area for striped bass since 1992 but no longer fish for them due to the severe depletion in the stock in our area. I have previously sent comments regarding the inability of the management process to address regional depletions of the striped bass population.

Observance: After the moratorium days, the spring and fall striped bass fishery was very good. Beginning around 2010 I could see the spring striper fishery start to collapse. We eventually lost our fall fishery as well in 2018.

Comments sent: I have previously written to the Striped Bass board about my observation that we are gradually losing the spring striper fishery in the Delaware Bay. It came as no surprise to me as the spawning stock was under immense pressure. Delaware's commercial quota is almost entirely taken from the Delaware Bay in the spring on gravid females heading to the Delaware River to spawn. The recreational fleet shifted its headquarters to the northern parts of the bay to take advantage of the funneling effect as the bay narrowed into the Delaware River. Many many large gravid females were killed legally. While I realize that recruitment is a factor of both female SSB and zooplankton availability to the young fry, over time, effectively reducing pressure on gravid females is a woefully lacking component (fresh water component is intact) in the spring time frame.

Problem created: Our current management system fails to address depletions on a regional basis and allows an entire fishery to be lost in regional locations resulting in business failures and reduced angler effort and the subsequent effect on the local economic related entities.

Solution: The SCAA will need to be modified to allow for management of all major regional recruitment areas to include Delaware and Hudson River stocks. The best way to manage these stocks is on the health of the stock in the spring when these fish segregate to their natal rivers. Data to support the health of regional stocks could come from CPUE data or other stock sampling methods. The spring fishery should be managed separate from the summer and fall when the stocks intermix (to some extent) on migratory runs. Declining trends in regional stock status need to be addressed early on due to the long time frame for females to reach reproductive status. Declines should be addressed with spring restrictions for both sectors.

Final thoughts: We have allowed our once vibrant recovered striped bass population to once again decline. I think we tend to liberalize regulations too much on very healthy stocks. One fish per person is plenty on such an economically important species. Preserving the large breeders (at least on the recreational side) and circle hooks should help.

Capt Harv
Vetcraft Sportfishing
Cape May, New Jersey
Call or Text 610-742-3891
Email: vetcraft@aol.com
www.vetcraftsportfishing.com

Comments

From: Henry Barber <hcb@henrybarber.com>
Sent: Thursday, February 25, 2021 4:40 PM
To: Comments
Subject: [External] Protecting Stripe Bass

Sirs,

I have been fly fishing for stripers since 1980 when I bought a second home on the Saco River in Camp Ellis. I have had many successful seasons and some not so good ones. The main thing I have noticed over time is that the striped bass fishing can be massive as in lots of fish throughout the season, consistent meaning going from mid May to mid October or can have strong periods of 24 to 30 inch fish, which we all look forward to. Many years I have noticed that the fishing is poor because the ecosystem isn't healthy. What I have noticed in the last few years though is that the ecosystem is healthier and healthier. There are better blueback herring runs, sand eels of all sizes, mackerel school through maybe menhaden in different stages, but the fishing is getting worse. Smaller fish, less consistent fishing, big periods of getting skunked etc. I know one thing, I am fishing with more skilled anglers and I am talking to more people than ever before. Our fishery is in trouble.

I also have a couple that have salmon fished in the Gaspe and a Swiss friend that has a home there all of them of course fishing for salmon. But they are seeing stripers more regularly for the past 15-years. Water temps, bait traveling and now commercial fishing…

I am not interested in NJ, NY, CT, RI or MA, all of the states getting to the New Hampshire and Maine coastline having any more leniency in regulations. Retailers in the state of Maine are not allowed to sell wild striped bass for consumption. I am not interested in relaxing regulations. I think it is arrogant and a sense of entitlement that party boats or commercial fishing interests can siphon off great fish stocks before they get to NH & ME. We need all restaurants, motels, fly shops, small bait shops and all the other businesses that benefit from striped bass to enjoy part of the enrichment of this great resource. Please help us protect the historic striped bass migration by putting a moratorium on commercial interests until we can get back to some form of normalcy.

Thank you for reading my perspective.

Cheers,

Henry C. Barber

Comments

From: Paul Koulouris <pkpetersham@gmail.com>
Sent: Thursday, February 25, 2021 1:50 PM
To: Comments
Subject: [External] Striped Bass Management

>> Thank you for the opportunity to comment on the proposed striped bass management plan for 2021.
>>
>> The worrisome graphic depicted in figure 1, page 7 references 2018 estimates for female breeder stock biomass, and reveals a striking decline, with values well below threshold going back to 2014. If the graph were extended through 2020 it's likely that this trend would be seen to continue, as reflected in the weak commercial harvest of large fish in 2020, reaching only 55% of quota despite extension of the approved commercial fishing days.

>> This alarming decline in the breeder stock biomass is apparent to every experienced striped bass fisherman in Mass. I have been fishing around Cape Cod for more tan 40 years and perceive a trend which could take us back to the fishery collapse of the 1980s. At the same time we see an illogical disparity between the recreational and commercial harvest rules, with commercial fishermen allowed to harvest only the most efficient breeders over 35".
>> In this regard it's instructive to consider the history of Florida's approach to preservation of the snook and redfish species. Slot limits and tightened seasons proved helpful but full recovery of the species required closure of all commercial harvests.

>> The commercial fishery in Mass likewise requires scrutiny. With scarce striped bass fillets selling at $22-$25/pound in Mass markets most citizens can't afford this luxury, so it's not defensible to suggest that a closure of commercial harvests would be unfair to the broad population of fish consuming citizens. Likewise it makes no sense to permit commercial fishermen to harvest only the most efficient breeder stock over 35".
>> If the commercial fishing lobby has sufficient lobbying clout to to prevent the logical closure of commercial harvests a second best (but short sighted) solution would be to apply to them the same slot limit which applies to recreational fisherman, preserving the threatened breeder stock.

Comments

From: Michael Kelleher <mhkelleher72@gmail.com>
Sent: Thursday, February 25, 2021 11:20 AM
To: Comments
Cc: Paul Koulouris; Jonathan Black
Subject: [External] Striped Bass PID

Thank you for the opportunity to comment on the proposed striped bass management plan for 2021.

The worrisome graphic depicted in figure 1, page 7 references 2018 estimates for female breeder stock biomass, and reveals a striking decline, with values well below threshold going back to 2014. If the graph were extended through 2020 it's likely that this trend would be seen to continue, as reflected in the weak commercial harvest of large fish in 2020, reaching only 55% of quota despite extension of the approved commercial fishing days.

This alarming decline in the breeder stock biomass is apparent to every experienced striped bass fisherman in Mass. I have been fishing the Duxbury and Plymouth bay areas for more tan 50 years and perceive a trend which could take us back to the fishery collapse of the 1980s. At the same time we see an illogical disparity between the recreational and commercial harvest rules, with commercial fishermen allowed to harvest only the most efficient breeders over 35".

In this regard it's instructive to consider the history of Florida's approach to preservation of the snook and redfish species. Slot limits and tightened seasons proved helpful but full recovery of the species required closure of all commercial harvests.

The commercial fishery in Mass likewise requires scrutiny. With scarce striped bass fillets selling at $22-$25/pound in Mass markets most citizens can't afford this luxury, so it's not defensible to suggest that a closure of commercial harvests would be unfair to the broad population of fish consuming citizens. Likewise it makes no sense to permit commercial fishermen to harvest only the most efficient breeder stock over 35".

If the commercial fishing lobby has sufficient lobbying clout to to prevent the logical closure of commercial harvests a second best (but short sighted) solution would be to apply to them the same slot limit which applies to recreational fisherman, preserving the threatened breeder stock.

Comments

From: Alan Anderson <aramagnum4@gmail.com>
Sent: Wednesday, February 24, 2021 2:32 PM
To: Comments
Subject: [External] Striped Bass regulation

I have fished for Striped Bass for 20 years as a recreational fisherman. I have not caught Striped Bass nor bluefish, for several years. I believe the resource has been greatly over-harvested by commercial fishing. I believe that a 2 year ban on commercial harvesting would do much to replenish fish stocks.

Comments

From: James Mcmanus <jamesmcm1766@gmail.com>
Sent: Tuesday, February 23, 2021 11:08 PM
To: Comments
Subject: [External] Amendment 7 public comment

Hello,

I am a long time recreational, catch and release fisherman from Massachusetts. I am writing to express my feelings on the proposed changes within amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. My main concerns are with issues 5 and 9.

First, the suggestion that a migratory species should be managed any other way than looking at the entire coastal range as one system is beyond reason. This would completely handicap any effort to restore this overfished species by not examining the full scope of the problem. If one state in the migratory range has irresponsible management practices, how could that not impact the whole population? I think you all know the answer to that.

Second, the suggestion of adding days to the already irresponsibly relegated commercial season is unbelievable. Commercial operations are already missing their harvest quota year after year, with lower and lower numbers, why do you think that is? Adding more days to commercially fish an already drastically overfished species is a huge mistake. Did we not learn our lesson with the Atlantic Salmon? We can either take measures, and make decisions to save this species now, or soon enough the effects your mismanagement will have eliminated any option that we once had and the fish will be gone. Climate change and overfishing are the two main factors affecting pretty much all species of fish. I know you guys can't do anything on the climate change front, but let's at least not let the commercial aspect get more out of hand than it already is.

Figure it out.

James

Comments

From: George McAuliffe <george.mcauliffe@gmail.com>
Sent: Monday, February 22, 2021 5:55 PM
To: Comments
Subject: [External] Striped Bass PID

Hi

- Striped bass should be Federally managed;
- There should be a slot limit, just above first spawning age;
- Limit of one keeper per angler per day

Thanks,
George McAuliffe
recreational angler, Suffolk County, Long Island, NY

Comments

From: arthur romaine <romaine862@gmail.com>
Sent: Monday, February 22, 2021 11:09 AM
To: Comments
Subject: [External] STRIPED BASS PID

To Members of the Atlantic Striped Bass Management Board:

In 1978 John Cole, a noted author and conservationist, wrote the book *"Striper; A Story of Fish and Man"*. It was, and remains, a great story of his days as a commercial fisherman and it contains a detailed natural history of the striped bass.

In the ensuing 43 years since the book was first published, governments and special interests - commercial, recreational and conservation - have spent millions of dollars and untold man hours studying the subject to death. And to what benefit? The population of this most prized of food and game fish has shrunk significantly. Yes, there are ups and downs in the numbers, but the trend is not upward. It's not even flat. It's downward.

I am over 80, have lived on the eastern end of Long Island most of my adult life, and have been a recreational fisherman for over 60 years. I have pretty much been witness to the havoc placed upon striper populations as the northeast Atlantic shoreline - North Carolina to Maine - became so crowded the past 30 years. The pressure - both from commercial fisherman to feed that population, and from recreational fisherman to enjoy the pleasures of being on the water and catch stripers - has brought the stock to extremely dangerous levels. That's not an opinion. It is a scientific fact and you have read, I hope, most of the science about the fish. For a thorough financial review, I recommend *"The Economic Contributions of Recreational and Commercial Striped Bass Fishing"* published around 2018 by the Max McGraw Center for Conservation Leadership.

I believe the ASMCF and ASMBD have missed the boat over the years to stop the overfishing. I urge you to take this opportunity to recognize in Draft Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass that the quantity of the stock is more important than trophy size and that increasing the size and health of the striper population benefits both recreational and commercial interests. To accomplish this goal, the breeding stock needs to be allowed to recover. This will require increasing size limits again as well as reducing the killing. And patience.

Thank you
Arthur Romaine
Bridgehampton NY

Comments

From: Ed Bailor <bailor@comcast.net>
Sent: Saturday, February 20, 2021 3:52 PM
To: Comments
Cc: Comments; Comments
Subject: [External] Stripped bass PID

Stripped bass comments for the preservation of the species:
1. Eliminate all netting or taking of striped bass by any type of nets, such as pound nets.
2. Eliminate commercial harvesting of stripped bass 3. Make all states have the same restrictions, same creel size and limits 4. Reduce mortality rate by making sure in enforcement of no culling by charter boats
5. Making the charter size fish larger than recreational fisherman, charter fisherman fish every day and know when and where the biggest fish are. Recreational fisherpersons on get out a few times a season.
6. Lower the occasional recreational fisher fish size limit to be less by 2-4 inches than charter boats.
7. Require all charter fisherman to hand out self addressed or have on hand cards to be mailed reporting their experience and or impropriety of charter boats. This shall be handed out to their patrons. Such as reporting all culling, over limits and dangerous experiences without reprisal because it's a mail in procedure. You never know what info you will receive, punish those captains not compliant.
8. Reduce menhaden overfishing
9. Make charter boats not leave the dock one or two days a week like crabbing rules. Ensure that the charter boat does not have any charters that day, enforce it.
10. Ensure all Atlantic states follows same rules and enforcement

Ed

Inspector Ed Bailor
USCP retired

Comments

From: Lisa Eggie <leggie04@comcast.net>
Sent: Saturday, February 20, 2021 10:05 AM
To: Comments
Subject: [External] Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke,

I'm emailing you to express my comments concerning the draft for the ASMFC Amendment 7 for Striped Bass Management.

I believe that the wild Stripe Bass should be declared a game fish throughout its range along the Atlantic Coast. The real value of Striped Bass is not as a seasonal market commodity but as a public resource that offers social, economic and recreational benefits to millions of Americans from Main to South Carolina.

300 recreational fisherman to 1 commercial fisherman.
The majority of commercial fisherman are part timers.
Recreational fishing provides more jobs.
Recreational fishing provides a much higher economic impact.
The existence of proven Aquaculture operations works in favor of gamefish status for wild Striped Bass.

It is clear the current Striped Bass management scheme under the aegis of ASMFC has in essence privatized the resource for the benefit of a small number of part time commercial fisherman who are harvesting an inordinate number of Bass in various numbers along the coast. I believe all commercial fishing for wild Striped Bass should end. The ASMFC should set conservation goals to provide high quality recreational/ personal use fishery so significant social and economic benefits can be reached.

Sincerely,

Capt. Duane Eggie

Comments

From: John Legg <jcl4@jlegg.org>
Sent: Wednesday, February 17, 2021 3:00 PM
To: Comments
Subject: [External] Atlantic Striped Bass Proposal

As a fisherman in the middle Chesapeake Bay, I propose lowering the minimum size to 16" and limiting the catch to one fish per person per day. This should vastly curtail throw-back mortality.

Regards,
John Legg

Comments

From: John Norton <jnorton@annapolisharbor.net>
Sent: Wednesday, February 17, 2021 2:29 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern in regards to the striped bass fishery,

As a lifelong boater, avid fisherman, lover of all things Chesapeake Bay related and maritime professional, I have personally seen significant changes in the Chesapeake fishery over the last 10-15 years. Notably the absence of quantity of baitfish. We used to be able to see an abundance of bay anchovies and small fish. These are nearly gone. Additionally the menhaden are disappearing from the middle to upper bay. This is likely all tied together and should be much closely monitored.

When menhaden cannot make it to the central portion of the bay or even into Maryland's waters, we will not be able to have a decent Striped bass population. Fish follow food and with no food source there will be fewer, if any, predatory fish. Resolve this issue and we can, over time, resolve the striped bass population. Additionally, commercial fishing consumes significantly more than does recreational fishing. Limiting the recreational catch size below that of the commercial size limit catch does nearly nothing for the long term ability to replenish the stock. If recreational catch limits and sizes are slightly lower than the commercial side, you may have some unintentional death of the species yet no where near the intentional depletion by commercial fishing.

These are tricky legal battles that must be done in the best interest for the species and not for the best interest of the pocketbooks of lobbying groups and commercial seafood markets. We have to ask ourselves whether the bay and its surrounding waters are better off for the economic viability for the fish that are in the water or for the value of fish that live in the water. The long term answer is that fish must live to be valuable. The slaughter of the striped bass food source from decades ago is causing the depletion of todays stock of breeding fish.

We all want what is best for the Chesapeake. There is no question in that thinking. The only option is to limit companies that deplete the food source for striped bass to a level that will attract the predatory fish back into the bay. Once that occurs and is sustainable, we can have a continual harvest that does not cause irreparable harm to our striped bass population for generations to come.

All the best,

John Norton | President

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Comments

From: gary_clarke@comcast.net
Sent: Wednesday, February 17, 2021 12:44 PM
To: Comments
Subject: [External] Rockfish mamagement

How is it that one company, Omega Protein continues to fish Menhaden, a primary food source for Striped Bass, with spotter planes and purse seines which capture tons of fish with each haul? Do you want to manage Striped Bass without addressing this concern? Why has Omega Protein been given free rein to overfish this animal to enhance their profits and without considering the effects on Striped Bass populations especially in the Chesapeake Bay?

Comments

From: JOSH ELDRIDGE <monomoyjosh@gmail.com>
Sent: Tuesday, February 16, 2021 11:07 AM
To: Comments
Subject: [External] Striped bass pid

To whom it may concern,

My name is Josh Eldridge. I was born, raised, and live in Nantucket ma. I've been involved in the charter/ headboat industry for the last 33 years. My quick thoughts after reading through the "Request for public comment".

Issue #7. I think the actual dead discard rate is much higher than the projections indicate. In my area recreational fisherman on frequent occasions will catch and release anywhere from 20 to sometimes 100 fish a night. This goes largely unreported due to the lack of observers and reporting in this area.

I think you guys are on the right track with the circle hooks for bait fishing. I'd love to see a ban on treble hooks. Fishing a plugs with 2, or 3 treble hooks doesn't really seem to be inline with what is largely considered a "catch and release fishery"

Issue #8. Not opposed to Recreational harvest limits, but I don't think this approach will accomplish its intended goals, unless your going to shut the recreational fishies down completely, ie no "catch and release". Even if you do that you will run into enforcement issues. People will simply claim that they are bluefishing.

Issue #9. As for the commercial industry, I have no idea how to fix it, at least not with Massachusetts current regulations. It ceased being commercial fishery years ago. It's more of a hobby than anything now. Maybe it should be closed, maybe not.

I myself and many of friends and family are not fans of gnawing on giant striped bass. Harvesting 35" and above fish for market doesn't seem to make a lot of sense to me. With the current amount of 35"+ fish around means that the commercial guys have to go through dozens of undersized fish, increasing the rate of accidental dead discard. I realize this number is way smaller than the recreational but an increase is an increase. The extra time and effort spent trying to catch commercial sized fish make it near impossible to actually make any money at it. The amount of extra burden it puts on the environment in the way of fuel needed, exhaust into the atmosphere, the use of plastic fishing line, the accidental but inevitable loss of lead sinkers and jigs (why are we still using lead? General consensus is that it's pretty terrible for the environment), etc. It all seems like a lot of extra impacts and expenses to catch a fish that you have already set aside quota for. Just seems to me that reducing the minimum size down to whatever to recreational limit would make more sense. Yes the quota will be landed faster, yes the seasons will be shorter. There won't be extra quota to be transferred to states that have overages, so states need to hold quota in reserve to avoid this issue.

Using the numbers from the 70 to establish harvest projections for today may no longer be the best, or most scientific method. Those numbers may be optimistic for today conditioned. I realize that another reduction in the commercial quota won't be very popular but it would be one very manageable tool use in the current situation to get the stock back to sustainable levels.

Thank you for your time,
Sincerely
Josh Eldridge
Monomoy Charters Nantucket
508 901 1120

Sent from my iPad

Comments

From: John Carmack <carmack7709@gmail.com>
Sent: Saturday, February 13, 2021 10:12 AM
To: Comments
Subject: [External] Atlantic Striped Bass Board Approves Draft Amendment 7 PID for Public Comment

Marine Fisheries Commission,

Menhaden decline is a KEY component to the rockfish decline. I believe MENHADEN OVERFISHING has depleted the primary food source for the rockfish. The Chesapeake Bay Foundation notes:

"*Menhaden have been called the "most important fish in the sea." In the Bay, they create a vital connection between the bottom and top of the food chain*."

I wish to add my observation on the health of the striped bass population in the Chesapeake Bay as it relates to the Menhaden decline. I have enjoyed recreational fishing on the Bay since 1995 and have routinely fished for rockfish since 2004 each fall/winter season. I studied biology in college and have continued to read and learn about the cyclical nature of biological systems such as those in the Chesapeake and understand the impact on these systems due to weather, pollution, run off, food chain related issues, etc.

Beginning in the early 2000s it was evident that the striped bass (rockfish) fishery had made a tremendous rebound as a result of prior management efforts. My friends, family, and I caught fish on every trip. These fish were consistently 22-28 inches, healthy, and very plentiful. One thing we always noticed was the number and size of MENHADEN found in the stomach of each fish. It was common to find 3, 4, 5, or more "finger to hand" size menhaden in each fish.

Four years ago (fall 2016) the character of the catch and the lack of menhaden began to change. Election Day November 2016, my friend and I fished and literally caught 150 rockfish.....ALL but 4 were less than 18 inches. Since then, the size and number of fish have noticeably declined. More importantly however, the number of menhaden found in the stomachs of rockfish have also declined in both number and size. This year we caught 6-8 keeper size fish and only ONE FISH had a MENHADEN in its stomach. We are finding glass minnows, baby trout, shrimp, eels, but little to no menhaden.

It should come as no surprise that the historic harvests of Menhaden in the early to mid 1970s was followed by an almost complete collapse of the striped bass fishery and menhaden overfishing is more the norm than exception in the Bay for the last 50 years. We have a house at the mouth of Indian Creek, Kilmarnock, VA. It is not uncommon to see 3-4 of the Menhaden ships from Reedville in Fleets Bay throughout the summer. This fall I was fishing in the middle Bay near Bouy 59A. It was a calm day with some menhaden flickering on the surface. I noticed 2 menhaden spotter planes overhead and within 10 minutes had 4 Menhaden fishing vessels coming in at full speed and they literally ran me out of the area.

PROTECTING THE MENHADEN POPULATIONS IS KEY TO A HEALTHY BAY AND SUSTAINABLE ROCKFISH POPULATIONS.

Thank you for your time.

jc

John T. Carmack, MD, MPH
Emergency Solutions Plus, LLC
804-928-8167

Comments

From: Marc Van Pelt <info@wittmanwharfseafood.com>
Sent: Thursday, February 11, 2021 2:48 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom it may Concern:

I was a charter Captain for 21 years and have been a commercial fisherman my whole life. The waters I fish have been from Tolchester, MD to Hoopers island.

I now live on in Sherwood, MD, near Tilghman Island - I am GM of Wittman Wharf Seafood in Wittman Maryland.

My thoughts on the Rockfish -

This is what I know to be a facts.

The Rockfish population diminished for one reason and one reason only, you don't catch spawning fish. That simple! - The commercial guy is allowed no fish over 36 inches which makes perfect sense. Their simply should be no spring season. Or at that very least 3 fish per charter boat. I always said it when I was chartering. The people don't come nowhere near eating all that fish. I am not able to count of all the fish I fillet with roe in them. I always this is the dumbest thing I think I have ever witnessed.

And the commercial guy in the Northeast is allowed to harvest our spawners, that simply makes no sense at all. Please explain

Now back to where we are. Their are more 10 to 16 inch Rockfish that I have ever seen in my life, whether science is wrong, I really don't know. Or perhaps if they keep going back to where they do the spring surveys and the weather is bad - The results could be dramatic in difference from one week to the next. When the boats down Tilghman bait up for trot lining their is not one boat after a couple of weeks baiting up that don't have hundred if not more Rockfish under their boats. Where did these fish come from? I mean you actually net these fish up. You can film them.

This January and February the guys that commercial fish could catch 1000 pounds of fish in the 5 to 8 pound class in 3 sets of nets. Leave at 6 and be in by 1. It was like this all up and down the bay. My guys have never seen so many. They usually go at 2 am and stay till dark.

In my opinion if you closed the spring season for 3 to 5 years and let the fish spawn most of your problems with your numbers would be fine. Let the recreational guy catch 2 fish in a slot on the off number years and make sure they are allowed a smaller fish. i.e. 16 to 18 inches. And say the class of 2019 was bad (even though a have tough time believing it) and you know the fish are 22 inches - say none 22 to 25 inches.

I can also assure you the Crab population is taking a hit because of Rockfish.

Thanks for your time Captain Marc Van Pelt

Comments

From: Michael Lyons <MLyons@rowman.com>
Sent: Thursday, February 11, 2021 12:03 PM
To: Comments
Subject: [External] Striped Bass PID

I am writing the Atlantic States Marine Fisheries Commission to implore you to take drastic, yet reasonable action to preserve the future of striped bass, that are clearly in decline as a result of changing environmental factors and over fishing. I am aware that there are many stakeholders that have varying opinions about who should be able to catch and keep these fish, and when. The stark reality is that some of these stakeholders will be unhappy with what needs to be done to preserve these fish. Jobs may be lost and some recreational anglers may be unhappy, but without this fish, we lose a resource that has value in the hundreds of millions of dollars annually and captures the love and attention of countless people along the East Coast. Whatever impact any short term losses have as a result of fishery closings or catch limits will pale in comparison to the long term harm to the economy and tourism to states along the East Coast.

It is clear that current attitudes towards keeping these are not sustainable. People may be unhappy that they cannot keep these fish, but without a healthy reproducing stock, there will be no fish to catch in the first place. Whichever actions this commission chooses, please keep in mind the long term value of this fishery over the short term economic gains or losses that may occur as a result of actions taken. Please work to encourage all stakeholders to release more fish and educate anglers about the benefits of releasing fish.

Over my decade of fishing for these fish, it is apparent that fish are smaller and more scarce right now. In the Chesapeake and Potomac River, their populations are less stable and it is harder to predict when and where they will be. This may be partly due to climate change, but that only strengthens the mandate to act now to save these fish. It is clear that water issues may be out of reach of this commission, so it becomes more important that we take action to kill less fish and educate the public about the economic and societal benefits of the striped bass.

Respectfully,

Michael Lyons
Business Development Manager
The Rowman & Littlefield Publishing Group, Inc.
National Book Network
4501 Forbes Blvd, Suite 200
Lanham, MD 20706
Phone: (301) 459-3366 ext. 5531
Cell: (301) 602-1323
Fax: (717) 685-9906
Email: mlyons@rowman.com

Comments

From: Kevin E Hendges <kehendges@gmail.com>
Sent: Monday, February 08, 2021 10:27 AM
To: Comments
Subject: [External] Striped Bass PID

It is of my opinion and observation that we need to stop all inshore trawling and all inshore gill nets in North Carolina to allow the juvenile fish a chance to grow and the adult female fish to get large enough to reproduce. We need to protect the Atlantic Menhaden population from over harvesting on the Atlantic coast, since this is a major food source for ALL Atlantic fish species.
I am in favor of a continued moratorium on Striped Bass if that is what it takes for them to recover, but it will also take protecting their food sources, and stopping all inshore trawling and all inshore gill netting in NC to actually see a positive difference.
The moratorium on the Cape Fear River system has been in place for several years, and it has only made a minimal difference in our striped bass population on that river system. The remaining two dams on that river system need fish ladders around them to allow enough river length and flow to allow eggs to hatch successfully.
The moratorium on the central coastal region in NC has been in place almost two years in NC, and it has not made a substantial difference in our striped bass population. That tells me that over harvesting may not be the problem. It sounds like trawl nets and gill nets are still killing these fish, even if they cannot be legally harvested by the fishermen.

Thank you,

Kevin E. Hendges
7120 Winter Pond Way
Fuquay Varina, NC 27526
kehendges@gmail.com
919-422-0292

Comments

From: Dan <ds6051@yahoo.com>
Sent: Saturday, February 06, 2021 10:34 AM
To: Comments
Subject: [External] Striped bass PID

Hello

A very simple proposal would be to make the fishery catch and release only during spawn season, perhaps on alternating years.

Also the states should retain the ability to implement equivalency measures as the fishery is different in different places. One size fits all rules are not the way to go.

Thank you
Dan Sheehan
15 Tabor
Little Silver, NJ 07739

Sent from my iPad

Comments

From: John Bonanno <jbonanno51@gmail.com>
Sent: Saturday, February 06, 2021 9:09 AM
To: Comments
Subject: [External] Striped Bass PID

First of all I am from Maryland and a member of CCA.

I have been following this process for the past 3/4 years and each year it continues to fall short of its goal!
Realizing it not one simple solution but an attack on many fronts. The board needs to STOP going after low hanging fruit but attack it in the large controlled areas!
We can not look at Striped Bass by it self.
Striped Bass need food so not only are Menhaden important as food supply but I feel the by catch is being reported incorrectly. Hugh nets do not discriminate what they scoop up. Large schools of fish (of all types) feed on large schools of Menhaden so when the are netted so are the fish feeding in them.
Secondly netting in the confines of the Chesapeake Bay is like fishing in a fish bowl.
The commercial fishing in Virginia with nets though controlled and measured is an issue they go after the breeders and the when they are headed north to breed they are some prime breeding fish. I'm sure it not happening in VA only.
The recreational anglers are not at fault! Most anglers DO NOT know how to handle fish properly for maximum survival. Educational process is important! It might be time to impose a catch and release rule for a few years. Or ban all bait fishing. I think it known that artificial lure are less likely to deep hook!
Last but not least the CE process is terrible! I have seen here in Maryland it only protects special interests and does NOT protect the fish!
If ASMFC sets a policy to protect the fish with a goal to increase the biomass the ALL states follow.
After last years public comments within the state being totally ignored and Maryland giving into the commercial and charter fishing groups it is clear they do not have the interest of the fish.

We all know the fish are worth more in the water! Your task is very difficult. Some times difficult choices needs to be made and though it may be a bad word a moratorium may be necessary to increase the biomass then hopefully learn from the past how to best sustain it!

John Bonanno
Stoney Beach MD
410-241-3529

Sent from my iPhone

Comments

From: brandon Hakulin <brandon.hakulin@yahoo.com>
Sent: Wednesday, March 24, 2021 11:07 PM
To: Comments
Cc: Sen. Craig A. Miner; Justin Davis; stripercomments@gmail.com; Del. Dana Stein
Subject: [External] Amendment 7 Comments

Good day all,

My name is Brandon Hakulin and I am a Marine Corps Veteran originally from CT who uses striped bass fishing to deal with the stressors of past and present circumstances. I am grateful for everyone involved in trying to help our striped bass. Unfortunately their numbers have declined and one is lucky to catch even one striped bass over 28" these days without travelling long distances or throwing bait.
We need changes to ensure numbers increase along with sizes of striped bass. These fish make me drive 3 hours or more to catch them and I spend money in the local businesses where they are found. I also purchase out of state licences as well. If their numbers and sizes continue to decline, myself and other traveling sportsmen and women may choose to spend their money elsewhere.
I have seen how proper management and making tough, bold, and sound decisions can play a major impact. In the Early 90's there was a one fish 36" limit. It was a time when a 13" tagged striper was the talk of the Camper's Jetty where we camped every year was the talk of the beach all the way to Meigs Point for 2 weeks. Not because it had a tag but because there were no stripers to be caught. It was so great to see them rebound but that is now old news and they are in decline once again. Please be bold and make the tough but right decisions to listen to the men and women who see the decline firsthand and make regulations that protect our fishery rather than destroy it or at best help it struggle to be mediocre.

Thank you all and have a great week,

Brandon Hakulin

Sent from Yahoo Mail on Android

Comments

From: Sean Hughes <shughes@hughesandcronin.com>
Sent: Wednesday, March 24, 2021 4:39 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Comments

Dear ASMFC members,

My name is Sean Hughes and I am a resident of Waterford, Connecticut. I am writing to you to state that I am in support of the American Saltwater Guides Association. I believe that the striped bass population is currently being overfished and that we need to do everything we can currently to restore the biomass. I believe that the four management triggers related to fishing mortality and spawning stock biomass included in Amendment 6 is need to achieve the goals of restoring the striped bass stock.

I fish often during the season (3-4 nights per week) and last season I noticed a significant decline in my fishing. I am fortunate enough to be able to surfcast the shoreline of Block Island, RI about 30 nights a season. Last year I noticed a drop off that I simply could not pass off as a “slow season”. I fished hard, longer, and with eels, than I ever have in past seasons. I managed 3 fish about 25 lbs, the season before I had over 30. In addition to that, every night when I look to the southwest, I see 50-100 boat lights out on Southwest Ledge fishing for striped bass. These fish are worth so much more alive than dead, and it is dire that we enact measures to ensure that we can rebuild the stock before things get even worse.

Thank you for your time and courage to enact strong protection measures for the stock.

Sean Hughes

Hughes & Cronin Public Affairs Strategies
455 Boston Post Rd, Ste 203 B
Old Saybrook, CT 06475
O: 860.346.7978 | C: 860.853.8748
Hughesandcronin.com

Comments

From: Peter Farrell <captainpetefarrell@gmail.com>
Sent: Wednesday, March 24, 2021 2:47 PM
To: Comments
Subject: [External] Striped bass PID

ASMFC,
Please consider the overall economic impact of proper management of the striped bass for ALL fisherman not just the commercial sector. It means so much to the recreational anglers for this great fish to be managed correctly.
Cheers,
Capt Pete Farrell

Sent from my iPhone

Comments

From: Christopher Uraneck <uraneckc@gmail.com>
Sent: Wednesday, March 24, 2021 12:00 PM
To: Comments
Subject: [External] striped bass PID

I am writing to comment on the Public Information Document for Amendment 7 of the Atlantic Striped Bass Fishery Management Plan. Thank you for going through this process and allowing the public to have input. These are my own personal opinions.

1. Fishery Goals and Objectives: I think the current goals and objectives seem pretty good.

2. Biological Reference Points: The historical estimates of SSB show big variations with changing data and modeling techniques, this seems pretty problematic to me. While the overall trend looks accurate I am less confident in the estimates of Female SSB (millions of pounds).

I think using either 1993 or 1995 as years to base the reference points off seem reasonable.

In the document there is a lot written about making this a two stock fishery or model. I don't think this is a good idea at this time. I live and fish in Maine and it is well known that the stripers we catch come from different spawning stocks (i.e. the Chesapeake, Hudson River, Delaware and even the Kennebec). To my knowledge there is no way to distinguish these fish and I don't see how you could effectively manage them as different stocks either.

3 + 4. Management Triggers and Stock Rebuilding Target and Schedule: I really like Management trigger 5, the one about the Juvenile Abundance Index. This seems like a pretty common sense idea. The first four all kind of seem like variations of the same thing and could probably be reworked, reevaluated and/or condensed.

Overall, I think that long term stability in management decisions is desirable. and I would like to see the current regulations remain in place and be given a chance to work.

5. Regional Management: I don't think different management programs for the Chesapeake and the ocean (and other regions) are appropriate at this time. As I stated before the various stocks of fish all mix in the ocean and I don't think there is a practical way to distinguish them and manage them separately. Also, there are different regions which have different population dynamics similar to the Chesapeake (i.e. Maine) where we don't necessarily get as many big fish that migrate up here as other states, so it doesn't seem fair that the Chesapeake gets a special management plan while other areas do not.

6. Conservation Equivalency: This seems like a tough issue to me. There are many pro's and con's about it. However, I think the current approach and regulations should be kept for the time being especially as the fishery is considered overfished. It seems like there could be a lot more discussion and research in this area.

7. Release Mortality: I think this is an important issue as I am a fisherman that does like to keep fish. However, I don't catch very many. I am lucky if I catch 1 keeper per year. So I do think it is appropriate to consider management actions that address release mortality as this seems to be such a high level problem. I have friends and hear reports from other fishermen who catch and release hundreds of fish. But according to your discard mortality rates they probably kill more fish than I do. Also I would like to

say that I would favor seasonal closures over more hook regulations. The hook regulations just don't seem that effective to me.

8. Recreational Accountability: I don't think RHL's are a good idea for this fishery. If implemented they would require much more rigorous monitoring methods which really start to take the fun out of the fishery.

9. Commercial Quota Allocation: I think it would be reasonable to address this issue.

10. Other Issues: I think this section is one of the most important. Understanding and accounting for issues like climate change, bycatch, disease and poaching are very important and they don't seem to have been given enough attention.

Thank you for taking the time to consider these issues. Striper fishing is an activity which is loved by a lot of people, including me, and we all hope it continues long into the future.

Chris Uraneck

Freeport, ME

Comments

From: Adam Cooperstock <adam.cooperstock@gmail.com>
Sent: Wednesday, March 24, 2021 6:50 AM
To: Comments; James Gilmore; Emerson Hasbrouck; Maureen Davidson; Sen. TODD KAMINSKY
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear Ms. Davidson and members of the ASMFC Atlantic Striped Bass Management Board,

Thank you for the opportunity to comment on the PID for Atlantic Striped Bass. I'm a recreational angler that lives in and fishes throughout Long Island, primarily in the waters of the south shore. I made some brief comments during the webinar for New York State that took place yesterday, but wanted to provide more detailed issue-specific written feedback during the public comment window.

Generally speaking, it seems clear that the species is at an extremely critical juncture and it is as important as ever for a long-term, unbiased, and science-based management system to be harnessed to pull us back from the brink. The reality is borne out in the data - numbers have declined precipitously from their relatively more stable and healthy position to multi-decade lows. While this was certainly an avoidable position to be in, there are hopefully lessons to be learned from how we arrived at this moment, and this should be looked at as a tremendous opportunity to enact substantial, long-lasting measures that will ensure a healthy fishery for generations to come.

Issue 1 (Fishery Goals and Objectives): I believe that the current goal and objectives for the fishery are sufficient and recommend that this issue be removed from further consideration.

Issue 2 (Biological Reference Points): I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7. Coincidentally, on the basis of landings and harvest, we're more or less back to those levels already, and the trend is definitely not in our favor. Hopefully part of the measures that can be taken will allow for the year-to-year swings in the data to be a bit more stable/consistent going forward. The fact that landings and harvest have declined so much is not indicative of a need to redefine what constitutes a healthy population. Until and unless the science exists that firmly supports a change, let's leave this as it stands.

Issue 3 (Management Triggers): The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4 (Stock Rebuilding and Target Schedule): The 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and a rebuilding plan should be initiated for Atlantic striped bass as soon as possible. Given the prior, undisputed evidence of the success of management techniques when they are enacted in a meaningful way, they should not be adjusted. While there are many different combinations of what at least could suffice as a sufficient rebuilding timeline, further extending the timeline could lead to a slippery slope of further dilutive measures which, when combined with some of the existing issues (CE as one such example) would continue to prolong and hinder the recovery of the species. We are long past the point of it being appropriate to lengthen the rebuilding horizon when the fishery needs rebuilding as we speak.

Issue 5 (Regional Management): Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, this issue should be removed from further consideration in Amendment 7. Until and unless there's rigirous scientific support for such a pivot, it is not necessary to implement. It seems like the Board has plenty of tools in its existing arsenal to properly manage the species - it's now just a matter of them being implemented to increase/maximize effectiveness given the mandate of the ASMFC and the current status of the stock.

Issue 6 (Conservation Equivalency): CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives. Ultimately, whatever noble intent there was here has not delivered, and CE has basically turned into the United Nations of policies. It is rife for exploitation and ultimately has a detrimental effect on the overall rebuilding process and many measures the Board could (and has, in the past) put into effect. It needs to be shored up at an absolute minimum - if that isn't possible, disposing of it altogether should not be off the table.

Issue 7 (Recreational Release Mortality): Addressing this issue in Amendment 7 is premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. More permanent, and potential drastic, measures, if appropriate, should not be implemented until and unless that study (and any other subsequent, current studies) advocate for such changes. In the interim, an approach focused on outreach and education to anglers in order to promote best practices for safe release seems like a no-brainer, which could only be beneficial to the species. Increasing awareness around best practices related to tackle (ie circle hooks as has previously been discussed, pinched barbs, single v treble hooks), fish handling, and so on would be eye-opening to many recreational anglers and would enhance any more concrete actions taken by the Board. I am totally in favor of that and believe that while many in the recreational fishing community are aware of (and operate in line with) such practices, many others are not. Promoting this would seemingly be in everyone's best interest.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6). There are many, many, many recreational anglers that are only too aware of this fish's plight and are entirely willing to do their part to see this fish thrive longer-term. You heard from many of them last night and will continue to up to this deadline.

Issue 9—Commercial Allocation: The Striped Bass Board should work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery. As with other provisions, a science-based approach is paramount; however, it is worthwhile to ensure that there is an appropriate reliance on the most current and appropriate data in making any decisions.

Issue 10—Other Issues: The Striped Bass Board should support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery. If and when this were to be pursued, it could potentially provide a meaningful addition to the Board's long-term approach; however, as I mentioned in my thoughts on Issue 5 above, any such measures should be withheld pending comprehensive research. Let's not put the cart before the horse.

The time to act is NOW. The data support this and there's a tremendous amount of support from anglers in NY like me, and up and down the east coast. It is incumbent on the ASMFC to facilitate these

initiatives, and to take positions which look above and beyond the present time and the positions of ANY individual person or constituency, and do what's in the best long-term interest of the fish. If it were up to me, and there wasn't anyone or anything else to consider, I'd advocate for some sort of moratorium as a way to hit the reset button a bit and provide a window to put into effect lasting measures to put an end to the cycle of overfishing of the species. In fact, during the webinar, several folks spoke that serve as the heads of organizations representing thousands of recreational fishermen taking a similarly reasonable, science-based and conservation-minded position. In some cases these people expressed a desire for moratoriums of up to 10 years to right the ship. However, from my perspective, taking measures that drastic would create more substantive issues for plenty of other stakeholders, so I am not in favor of that level of restriction. I believe that a more measured approach, but one that ultimately shares the same spirit of sustainably rebuilding the stock, is the way to go. It's past time for action.

There are plenty of folks that are extremely passionate about these issues and this fish, and we want to see the pieces put in place for it to thrive in the future, just as it has in the past. I thank you kindly for taking my comments as part of the review process and look forward to any opportunities to communicate with the Commission going forward.

Sincerely,
Adam Cooperstock

Comments

From: Raymond west <rrrwest@yahoo.com>
Sent: Tuesday, March 23, 2021 10:20 PM
To: Comments; Emilie Franke
Cc: stripercomments@gmail.com
Subject: [External] striped bass PID

From:

Ray West

30 Plain St East Bridgewater MA 02333 ·508-690-1382

TO:

Emilie Franke / ASMFC

Striped Bass PID comments

Fishery Management Plan Coordinator

1050 N. Highland St, Suite 200A-N

Arlington, VA 22201

Dear Emilie / ASMFC ,

My Name is Ray West and I am a MA resident that travels the Northeast fishing for striped bass. I do feel Striped bass stocks are in poor condition and would like to see aggressive measures taken now to benefit the long term health of the stock, allowing it to repopulate and flourish once again. I don't believe ASMFC can be too aggressive in rules put forth to manage the stock to abundance (there is no down side to the fish population), but you certainly can be to conservative and put the stock in further jeopardy. Please be aggressive in your management plans to allow Striped bass populations to exist in abundance once again.

In addition to my above request, please consider the following regarding amendment 7:

Section 2: Please keep biological reference point the same as in 1995, no need to change them.

Section 4: keep the 10 year rebuilding plan as noted in Amendment 6, have an aggressive rebuilding plan for Striped bass in Amendment 7

Section 5: I ask you pull this prom Amendment 7 given current status of Striped bass

Section 6: PLEASE only allow the use of CE when the stocks are not overfished or not in a overfished condition. ASMFC said in the MA hearing they are the decision makers when it comes to CE and you the power to enforce accountability for failure to meet the CE's. If ASMFC allows CE exist, please also define how you are going to measure the success of the proposed CE once implemented. Additionally, make the penalty grossly painful if you don't achieve your CE (make states wish they never used CE to begin with if their CE fails) & Lastly ASMFC has to actually enforce these penalties. I see CE as a loop hole, allowing states that don't want to follow the ASMFC rules, a way out, with little or no consequences. Please put some accountability in CE and be aggressive with enforcement, everyone will benefit.

Section 9: I believe you need to drastically cut back on the commercial allocation. Again be aggressive in managing striped bass for abundance.

In closing I also support drastic reduction of harvest for Recreational anglers too. If ASMSC ruled no harvesting Striped bass period, for Commercial and Recreational, I would have no problem with that. I actually think no harvest of Striped bass at all should be considered.

Please be the ASMFC that took aggressive action bring Striped bass populations back to abundance on in the Atlantic / East Coast.

Thank you for taking the time to read and consider my comments, I hope you put them to action.

Ray West

Comments

From: granolaspice <granolaspice@yahoo.com>
Sent: Tuesday, March 23, 2021 10:08 PM
To: Comments
Subject: [External] Striped Bass PID comments

My name is Stephen Rempe. I am a conservation minded recreational angler that fishes long island's south fork beaches. It is my belief that we need to manage the striped bass fishery for abundance and take what ever measures are needed to once again have a sustainable fishery. I also agree with a tag system for fish that are to be taken for consumption. I do think better angler education would have a positive effect on recreational release/ catch and release mortality in general. Many fisherman do not even understand that how they are releasing their fish is Incorrect. Greater law enforcement is needed as well. There are many people not playing by the rules. They go unchecked and take whatever they want. More law enforcement presence and stiffer penalties and fines are very much needed. Lastly we will all be happier, commercial and recreational anglers with more and larger striped bass. Please manage the fishery for abundance and do not lower the bar. Thank you for your hard work and dedication to our precious fragile beloved resource. Stephen

Sent from my Verizon, Samsung Galaxy smartphone

Comments

From: Tj <kinniburgh20@comcast.net>
Sent: Tuesday, March 23, 2021 6:56 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment VII Striped Bass

To whom it may concern,

I am writing this email in concern to the Striped Bass regulations in Future Years. I've fished my whole life and have fallen in love with saltwater fish especially striped bass (30yrs+) in Massachusetts. I feel it's only right as a recreational fisherman to preserve this fishery and should be done by any means possible. I would like to see there be a Catch and Release ONLY until numbers improve in the coming years hopefully. I would also like to see an increase on saltwater licenses only if money is going towards fish preservation and environmental protection. As for Commercial fishing season I would not want this to be extended. This fishery needs to be better managed and closely watched so we can enjoy this fish. I believe the next few years is important to either the preservation or destruction to the Striped Bass.

Sent from my iPhone

Comments

From: Mark Brandariz <markbrndrz@aol.com>
Sent: Tuesday, March 23, 2021 5:52 PM
To: Comments
Subject: [External] Stripe Bass Moratorium

There should be a two year moratorium on stripe bass. No fish should be kept! Heavy fines imposed on all poachers.

Sent from my iPad

Comments

From: Greg Cuoco <gregory.cuoco@verizon.net>
Sent: Tuesday, March 23, 2021 2:33 PM
To: Comments
Cc: stripercomments@gmail.com; James Gilmore; Maureen Davidson; Sen. TODD KAMINSKY
Subject: [External] Amendment 7 - Striped Bass Interstate Fishery Management Plan

Since the Atlantic striped bass stock has been declared overfished and depleted and the plan was to rebuild the stock I do not see why there are not measures being taken to ensure that this is the priority.
It's better to take decisive action and severely limit or ban all commercial fishing of this species until the time that the stock can recover. Recreational fishing must have a catch and release program and more education is needed for the public to learn how to safely handle and release fish.
I know this is an extreme response and people will not be happy but in the long run it's the only way to be sure that the Striped Bass will be able to survive. We have seen from the past that conservation works only to have the work undone by relaxing our watch on this important part of our fishery.
Please consider stricter measures regarding the future or lack there of of this magnificent species.

Thank you,
Greg Cuoco

Comments

From: Pete Gray <peter.g.l.gray@gmail.com>
Sent: Tuesday, March 23, 2021 1:39 PM
To: Comments
Cc: stripercomments@gmail.com; James Boyle; Thomas Kosinski
Subject: [External] Striped Bass PID

To whom it may concern,

I have watched with dismay at both size and quantity of striped bass (and blue fish, bonito) decline precipitously in the last 10 years in all the areas I avidly love to fish in New York and Northeast waters. The fact that we could have 20-30lbs stripers in overwhelming numbers as gamefish across the length of the Northeast and we have collectively chosen an outcome where they are truly rare, especially for fisherman interested in anything other than the most boring form of fishing: bottom fishing with bait, is just about the saddest thing I can think of. We have so many other fish to eat. Stripers and Blues are the jumbo apex predators and if we just kill a few less, any kid, with a will to learn the skill of fishing, will be able to go out anywhere and catch a true beast of a fish and make them fall in love with fishing forever. I document my catch counts meticulously. With roughly the same number of fishing sessions year over year in all these places listed below, I've recorded a 50% drop in fish landed and an even steeper drop in fish landed over 20lbs JUST IN THE LAST 5 YEARS!

New York
Long Island Sound
Staten Island
Southern LI Coast

NJ
Raritan Bay
Sandy Hook

MA
Woods Hole
Elizabeth Islands
Martha's Vineyard
Nantucket

$
Every year I spend over $5000 per year on guides, tackle, and gas on friends boats. I can name 20 more like me and there are hundreds more. The revenue (and thus tax revenue) generated by the people who oppose these measures is, without question, less than the revenue generated by the people who support a responsible fishery. If that's the hard calculus, then it's an easy choice.

We desperately need a solution where a much lower % of stripers landed go on to be killed or this trend can only continue. It's time for a correction. I dream of huge stripers cruising every flat, every channel, every bar, ever hole, and every beach from the Carolinas to Maine. It's a completely achievable goal! Let's make it happen!

Thanks,

Peter Gray
1709 Bulls Head Road
Clinton Corners, NY 12514

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Pete Gray
646.483.7438

Comments

From: Josh Tanz <jbtanz@gmail.com>
Sent: Tuesday, March 23, 2021 1:11 PM
To: Comments
Subject: [External] Striped Bass PID

Hi,
I am in support of significantly increasing striped bass population through reduced commercial limits, stricter size and bag limits for recreational anglers,
implementation of single hook and circle hook rules to reduce mortality, and any other conservation methods deemed necessary. I'm a recreational fisher located in Orient NY.

Thanks
Josh

Comments

From: Three Corley <corleywc@gmail.com>
Sent: Tuesday, March 23, 2021 11:05 AM
To: Comments
Subject: [External] Striped Bass PID

To Whom It May Concern,

I'm a rec fisherman that traditionally fish in the North Bay Area (above the bridge) during the summer months approximately 30-45 days a year. Like many of the local anglers, we've noted a significant decline in quality and quantity over the past 5 years. It's not uncommon to see hundreds of floating carcasses in the tide lines near the chumming/live lining fleet after a weekend of good weather. This can only lead to a further negative impact on this valuable public resource.

My main method of targeting fish is limited to trolling and jigging artificials as both methods tend to enable the cleanest hookups and subsequent release of fish. By trolling, I'm able to move around the fleet and get a pretty good view of the boating activity of other fishermen. What I see is surprising. I watch charter boats haul fish one after another for their clients. I also see these trips of 6 or more clients routinely limit out, leave the grounds, and return an hour or so later with their next wave of clients. The cycle repeats every weekend. I was dismayed last season when the DNR made the decision to limit the rec fisherman to 1 fish per person, yet allow charter boats to continue with their 2 fish per person haul. In the first year's data, for those who participated, and presumably submitted truthful catch reports, we saw 123,000 fish hauled from the bay by the commercial charter fleet. Another 23,000 reportedly released.

From a rec perspective, I watch as the rec fleet mishandle fish, gut hook, and outright ignore the circle/j-hook requirements for natural bait with limited enforcement by the DNR. Based on my observations, natural bait fishing is an unsafe practice for the fishery and worse, it's extremely effective. Naturally, these practices by the bait fleet lead to resultant killing fields of discards we see in the tide lines. It's quite frankly, appalling.

With such a valuable economic resource at stake, we need as a community to make tough decisions to protect this species. My recommendations, short of a multi-year moratorium (many fishermen are in favor of this approach presuming Catch and Release would be authorized) are as follows:
1. Universal limit of 1 fish per person per boat.
2. Limit future spring season to catch and release for the entirety of the season, using current C&R rules.
3. Eliminate natural bait fishing of any kind for the entirety of the fishing calendar. Artificial methods for fishing only. This would also have a positive economic impact as it would require many to retool their tackle bag and the resultant increase to boat fuel consumption. Conversely, it could reduce the amount of willing anglers, and/or disperse the fleet resulting in taking the stress off of the fishery and keeping a schooling/feeding frenzy in shallower waters from happening. The latter inevitably leads to fish being trapped on several of the bars when oxygenation changes in the water limit their escape. It also allows an even greater concentration of anglers and due to the fish being trapped, ultimately, a more successful presence by the anglers in their hauls.
4. Close the entirety of August where the water and air temperatures increase to dangerous levels for the fish resulting in increased mortality rates.

What we saw last season with the regulatory changes was a nonsensical approach against the overwhelming desires of the public, against the suggestions of the management report, and lastly, it clearly was targeted to cater towards the commercial charter fleet at the expense of the rec fisherman.

We need to act now before we lose this species as a viable sport fishing resource which would see a resultant negative impact to the economic side of the entire industry. Thank you for your consideration.

Respectfully,
William C Corley III

Comments

From: Emilie Franke
Sent: Tuesday, March 23, 2021 8:13 AM
To: Comments
Subject: FW: [External] stocks Striped bass

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: STEPHEN DESISTO [mailto:sdesisto1@comcast.net]
Sent: Monday, March 22, 2021 8:10 PM
To: Emilie Franke <EFranke@asmfc.org>
Subject: [External] stocks Striped bass

My Name Stephen Desisto Member Plum Island Surf Casters I fish in Massachusetts .I have been fishing for this great fish for over 50 years Seen it go down to nothing in the 80s Have we or should i say the Striped bass Management board ever stocked finger length fry in any body's of water on the east coast. Some thing else i wanted to talk about three things that take great numbers of bass out of the mix .Water quality or pollution#1 Bye catch from nets of commercial fisherman netting herring.#2 Fish kills #3. One other thing is Massachusetts can not extend the commercial days or the month they fish for Striped Bass in Massachusetts waters This fish gets hammered up and down the coast lets save the big girls to spawn for years to come Just my thoughts . Thanks for all you do Stephen Desisto PS just a fisherman .

Comments

From: Steve Kaine <stevekaine85@gmail.com>
Sent: Tuesday, March 23, 2021 8:12 AM
To: Comments
Subject: [External] stiped bass

It s critical we protect this species. My family is four generations of fisherman I want the next generation to be able to enjoy the sport I am so fond of. Please take steps to protect our resource!!!

Sent from Mail for Windows 10

Comments

From: Ray Hutson <rwhutson@hotmail.com>
Sent: Monday, March 22, 2021 9:19 PM
To: Comments
Subject: [External] Fw: 3/22 Rockfish Webinar

I sent the attached email during the meeting. As I said I have believed for years the way the problem is being attacked is not working and you need to go back to common sense. If you take one of these cows out of the water that may lay 3 million eggs, you may have 600,000 survive. Look how many fish you have destroyed which doesn't take in account the number in that 600,000 that may have gone on to produce even more fish. Years ago when it was illegal to catch these fish there were plenty of stripers and they were putting pressure on the crab population. STOP TAKING THE LARGE FEMALE FISH AND PUT A LIMIT IN THE SMALLER ROCKFISH CATCH. We get tired of all of this scientific means and money spent to cure the problem and it has only gotten worse.

Ray

From: Ray Hutson
Sent: Monday, March 22, 2021 7:51 PM
To: g2w2@asmfc.org <g2w2@asmfc.org>
Subject: 3/22 Rockfish Webinar

comme

I agree with Toby (approximately 7:40 pm) regarding protecting the female fish over 32 inches. I have believed this for years and brought it up at an Annapolis meeting last year. When I was a young man it was illegal to keep these "cows" as they were called and in those days there were an abundance of rockfish in the 12" to 25" range. Everyone is making this more difficult than it is "MAKE IT ILLEGAL TO KEEP FISH OVER 30 INCHES" and nature will take care of the problem.

Ray Hutson
2303 Cullum Road
Bel Air, MD 21015

Comments

From: Jonathan Kaine <jon.kaine24@gmail.com>
Sent: Monday, March 22, 2021 9:01 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello - I am writing in regards to the PID on Amendment 7. As an avid recreational angler I see the importance and value of preserving the striped bass population for future generations to come. From my point of view, I see absolutely no alternative other than maintaining and preserving a population of striped bass that is both abundant and includes an equal dispersion of all size classes of fish.

After having reviewed the PID, I took particular concern to a few of the topics within the document which I have listed below:
1) Based on my understanding and research, the 1995 biological reference year appears to be appropriate and should remain unchanged. I see no reasonable argument for choosing a reference year that included a less abundant and healthy population of striped bass. By maintaining a high reference point year and managing to that reference point, any measures and decisions on fishing regulations, etc.should move us back towards a point when striped bass were considered abundant and healthy.
2) Amendment 6 included a provision that if striped bass were determined overfished, a 10-year rebuilding plan would be established. To my knowledge, a rebuilding plan has not been developed even though striped bass were declared overfished almost two years ago.I am strongly in favor of developing a rebuilding plan and including that rebuilding plan as part of Amendment 7.
3) To my knowledge, there is no available science to support a regional management system. Unless it can be proven that a regional management system could be supported through science and would help maintain individually abundant and healthy regional populations of striped bass, I would encourage the removal of this from the PID.
4) I am strongly against conservation equaliency, especially when the striped bass population is overfished. I also feel that should a state exceed their limit in a given year then they should be held accountable and have the prior year's overage subtracted from the current year's limit.

Thank you for taking the time to consider my perspectives as a recreational angler who wants nothing more than an abundant and health striped bass population. I have high hopes that in due time the striped bass population will return to its once historically high levels. Thanks again,

Jon Kaine
781-439-3926

Comments

From: George Jehn <gjangler@optonline.net>
Sent: Monday, March 22, 2021 7:52 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Sir or Madam,

I am writing with respect to ASMFC request for input concerning the impending possible changes to the striped bass fishery.

Although I am a member of Stripers Forever, I cannot disagree more vehemently with their proposed closure of the striped bass fishery for both the commercial and recreational fishery for ten years, in the process making this only a "catch and release" recreational fishery for that period of time.

I have fished for striped bass for over 50 years, during both the great times and the bad. Unfortunately, the Stripers Forever hierarchy sees the current state of the bass fishery in dire need of closure, but I do not agree with their assessment. I base this position upon my experience. Following Superstorm Sandy, there was a period where stripers were very hard to come by on the eastern end of Long Island, particularly during the autumn fishery, which previously was always action-packed. I feel this was not due to a large decrease in the numbers of bass available, but rather due to the effects of Sandy. I say this because although the bassing was almost non-existent on Eastern Long Island, further west on the South and North shores, there was plenty of bass, both large and small. This told me that something else was at work that we had never before seen, perhaps different migration patterns? I don't know for certain, but the fishing came roaring back last autumn, both on bait and via jigging. I personally experienced excellent action in Montauk last autumn for the first time since Sandy.

There is, however, one area that in my opinion definitely needs to be addressed; that being the deadly dragger by-catch of striped bass. I witnessed hundreds of dead striped bass floating in Montauk waters last year after the draggers hauled their nets and had to throw these dead fish back, doing no one any good. This is a total waste of striper resources and needlessly kills many bass. I currently don't how this problem can be fairly addressed, but believe it can be remedied with some very serious thought and consideration by and for all. One way I know that helping striped bass fishing will not be done fairly is by recreational closure for a ten or even a one-year period because the fishing remains strong. Yes, the average size of the fish has changed, but that is to be expected as different class years grow and others die.

Just to reiterate, as a longtime striper fisherman, I strongly recommend that you folks reject the Stripers Forever bid to close the bass fishery to all but catch and release for any period of time. The only thing this will do is financially harm private, charter and party boats, as well as tackle shop owners and other individuals who make their living (which I do NOT) from the various components of the bass fishery which currently remains healthy and vibrant.

Please feel free to contact me if in need of any more input. Thank you.

Sincerely,

George Jehn

4 Mishaupan Place

Bayville, NY 11709

gjangler@optonline.net

Comments

From: Vincent Catalano <fishin4777@gmail.com>
Sent: Monday, March 22, 2021 5:46 PM
To: Comments
Subject: [External] STRIPED BASS PID

Hello,
My name is Capt Vinny Catalano I'm a Full Time fishing guide on the East End of Long Island, Where I've been guiding for Striped bass for the past 16 years...
This fishery has been collapsing at a alarming rate for some time now, 2012 was the first signs i saw of the collapse and now we're at a point where hopefully it's not too late and we still have a chance after years of poor management and constantly putting a bandaid to cover up what's been happening up and down the coast....
I think what's being overlooked is how much Economic value these fish bring to the table, Airlines, Restaurants, hotels, markets, rental cars etc... I have clients that travel from all over the country to chase these fish. Were at a point where striped bass are worth much more in the water alive then dead.
We need to start measuring what's left of this stock with the number one goal being abundance not threshold that's why we are in this mess.
Conservation equivalency should be terminated until the stock isn't considered overfished, it's a way for states to find loopholes in conservation we need to unify together in rebuilding.
I URGE change i URGE Amendment 7 we owe it to the fish, we owe it to the upcoming kids which i have two that want to enjoy this amazing resource in our waters.
Let's do what's right and save the striped bass fishery...

Thank You,

--
Capt Vinny Catalano
631-766-1695
www.longislandflyfishing.com
www.joeyccharters.blogspot.com
IG : @LONGISLANDFLYFISH

Comments

From: Chuck Gardner <cwgardner67@gmail.com>
Sent: Monday, March 22, 2021 5:19 PM
To: Comments
Subject: [External] Comments re:striped Bass Regs

To: Fisheries Management
As a preamble, I have fished in the Middle Bay area of the Chesapeake for 17 years. I have noticed a vast number of small fish in the 10-14 inch range. The fish in the the 15-20 inch range are also numerous. However, the 21+ inch fish have declined. It can be surmised that the number of more mature males are declining along with spawning females. As a recreational fisherman, I offer the following comments:

1. I see no defendable reason to allow fishing over spawning females. Opening of the season after spawning in all areas including the Susquehanna flats seems the right course of action.
2. Inline circle hooks for all bait fishing while targeting Striped bass is a good thing.
3. Replacing treble hooks with single hooks (preferably barbless) should be encouraged.
4. Crimping down the barbs on jig heads also reduces mortality on undersized fish.
5. Closure of season during the hottest time in the summer, especially during low oxygen levels, is a plus.
6. New Jersey, as of the date of my e-mail, is already catching /keeping large fish. I presume these are mostly females which have not spawned. While this is a terrific fishery for them…what has been the measurable impact on the overall stock assessment?

Amendment 7 covers a lot of ground. Some is backed by good science and some, by necessity, must be estimated. Wishing you success in improving the Striped Bass management plan as this is an invaluable species for both commercial and recreational fisherman.

Respectfully,
Chuck Gardner

Comments

From: Thomas Kosinski <kosinski.thomas@gmail.com>
Sent: Monday, March 22, 2021 4:37 PM
To: Comments
Cc: Joe Cimino; HEATHER CORBETT; TOM FOTE; Russ Allen; captadam@karenannii.com; ERIC HOUGHTALING; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 PID Comments

Dear Commissioners,

I am a New Jersey angler that is very concerned about the state of the Striped Bass fishery. I have been fishing from the surf and from my boats for the past 15 years and invest thousands of dollars per year in fishing tackle, travel throughout the northeast and vessel expenses in pursuit of striped bass purely for sport. The impact to the local and regional economy would be devastating if the striped bass stocks continue to decline. Fishing for striped bass has declined over the last 10 years and these fish need our help! The 2019 stock assessment shows that the striped bass stock is overfished and overfishing is occurring; yet, there is no plan in place to rebuild the stock. Regulators must understand that we need fish mortality below the established threshold. In addition, the spawning stock biomass must be brought back above the established threshold and to the target immediately. We need to not only end overfishing but also rebuild the spawning stock biomass. I am writing to provide my input and feedback regarding the most pressing issues in the Amendment 7 PID.

Issue 2: Biological Reference Points - I believe that 1995 should be used as the base year. The reason for this is that the population had been fully restored and was no longer in decline. Most importantly, there was a healthy mix of different age fish in the population at that time. Certain organizations would prefer to use years when the population was less abundant, essentially lowering the benchmark for future years, making it easier for them to harvest more fish. This would defeat the goal of restoring an overfished population and would never allow future generations to experience the great fishing that had been experienced in the late 1990s and early 2000s.

Issue 4: Stock Rebuilding and Target Schedule - Two years ago, the striped bass stock had been declared overfished. In Amendment 6 (the document that currently managed striped bass) there is language that states that a 10-year rebuilding process should be acted upon if we get to a point where the species is overfished. Two years have gone by and we still don't have a plan to rebuild the stock. Accountability is the issue here. We need to follow the rules of the amendment and come up with a 10-year rebuilding plan and not waste anymore time.

Issue 6: Conservation Equivalency - New Jersey and Maryland are the two states that not only use this but have abused it historically. MD has gone over their quota a couple of times over the past few years and has not been penalized. Overall, conservation equivalency should not be an option for a fishery that is overfished and states that go over their quota should be responsible for taking a cut in following years. Our state should volunteer to put CE on hold at least until the fishery is back to a sustainable level. At that point we can discuss it, but CE has no place in an overfished fishery.

I appreciate your time and dedication. It is important that we continue to look to science and resist the short-sighted economic benefits of some and focus on the long-term health of the fishery and the economy to help us come up with solutions to restore the fishery. I look forward to our state's meeting on Thursday evening. Have a nice afternoon.

Regards,
Tom Kosinski

Comments

From: Brandon Smith <brandons7711@gmail.com>
Sent: Monday, March 22, 2021 4:20 PM
To: Comments
Subject: [External] Striped Bass PID

Hello Emilie,

My name is Brandon Smith. I am a resident of CT and avidly fish for striped bass (and have been for the past 3-4 years). I also have experience working on charter boats out in the Long Island Sound.

First of all, thank you for all that you and your peers do for conservation. I would like to give my input on the circle hook regulations. In most cases, I very much support the initiative and think it will make a difference in the catch and release mortality. I have found success using circle hooks for striped bass with live eels, as well as when fishing bait for other various species. They work as intended and reduce the risk of release mortality and "gut hooking".

My issue with the proposal is primarily with the tube and worm rig. Over the past few years, I have caught thousands of striped bass, ranging from small (under 15'") to 30+ pound fish, with the tube and worm rig. When trolling this rig, I have **never** caught a striped bass (or bluefish for that matter) past the mouth. The way the rig is designed, there is such a small chance of the fish getting hooked deep. What this means, is that there is a very high percentage that fish are able to be released quickly and healthy.

The entire premise of circle hooks does not work well with trolled lures. Fish would need to fit their entire mouth around the hook, and the hook would need to turn slightly in order to grab/hook into the mouth, due to the inward facing point. With the tube, there is around 2+ feet of surgical tubing, which does not flex nearly as much as monofilament or fluorocarbon fishing line would, in a traditional circle hook setup. While I have never tested a tube and worm rig with a circle hook, my intuition says that it would be much less effective. Since it is trolled, one cannot wait for the fish to grab the rig and then react. Instead, the rig is constantly pulled, and I hypothesize would be pulled right out of the fishes mouth most of the time. This rig is very beginner friendly, and is one of the first rigs that I used to successfully target striped bass. By reducing its effectiveness, it will greatly discourage beginners and seasoned fishermen alike.

Additionally, with this proposal, the use of the tube and worm tipped with "Berkely gulp sandworms" would still be allowed, which are not a live or natural bait. While I have found they do not work as effectively, the rig would be the exact same, but with a "J hook". It makes little sense to allow one rig and not the other. They both work exactly the same.

With this being said, I believe it would be in the best interest of fisheries managers and all anglers to modify the circle hook regulations and make an exemption for the tube and worm, as surrounding states have. I believe the striped bass population has been put at a disadvantage from a lack of congruence with regulations across their range. The vast majority of fish are migratory, and subjecting the same fish to different regulations depending on geographic location makes little sense in my mind. I would also urge an exemption for bucktails or other jigs with a lead head, however, I have much less experience utilizing this method of fishing.

In conclusion, thank you for taking the time to read this and I hope you take my comments into consideration. Myself and other anglers greatly appreciate the work that everybody in fisheries management does.

Best regards,
Brandon Smith

Comments

From: Dave LaPorte <dal100@msn.com>
Sent: Monday, March 22, 2021 3:24 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

My name is David LaPorte and I am a surf fisherman.
My concern over the state of the Striped Bass has increased yearly since late 2007.
I mention that timeframe based on my personal experience. I fished 4-6 nights per week steadily through the 2000's till about 2009 based on my outings becoming far less productive. I was still catching fish but the numbers dropped sharply in both quantity and size. The frequency of fish over 30 pounds really dipped. This told me they simply weren't there.
I realize fishing patterns change and global warming has caused changes in nautical climate zones furthering change in the geographical territory taken up by fish. Many striped bass don't take residency in locations they once did, but by covering an area from Watch Hill to Newport/Middletown RI, fishing May through November that many nights per week told me something was going on with the state of the striped bass fishery and this something was not positive.
Since that time I have felt strongly that more has to be done in regards to conservation for the species. I have drastically cut back in my yearly number of outings fishing for stripers and focused a bit more on other species but surf fishing for stripers is truly where my heart is at.
Let's not repeat the mistakes of the past, haven't we learned anything from that moratorium.
I have nothing against commercial fishermen, everyone needs to make a living but I feel the Striped Bass should get the Game Fish status it truly deserves.

Sincerely
David LaPorte

Comments

From: Albano, Albert <aalbano@lirr.org>
Sent: Monday, March 22, 2021 11:58 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments on Public Information Document (PID) for Amendment 7 - for Atlantic Striped Bass

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Comments: Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass

Dear Emilie Franke and members of the ASMFC Atlantic Striped Bass Management Board,

I am 44 and have been fishing for striped bass as a recreational angler on Long Island for about 30 years. My comments are as follows:

Issue 1 - Fishery Goals and Objectives:

The existing (Amendment 6) goal (above) should theoretically suit the fishery's needs and priorities. As long as the tenets of that Amendment are heeded. As such, I don't see a reason for adjusting the goals.

Issue 2 - Biological Reference Points:

I believe the 1995 estimate of female SSB is still an appropriate benchmark for determining stock status.

It is disconcerting that, based on my read of the PID, there seems to desire (at least by some) to lower the thresholds. Why would we consider lower thresholds while the fishery has been in a diminished/diminishing state for several years? Seems ridiculous.

Issue 3 - Management Triggers:

I think we should stay with the plan that is detailed in Amendment 6. I don't see anything wrong with the management triggers from that Amendment. The problem isn't the triggers, it seems to be the ASMFC's willingness or unwillingness to abide by them.

Issue 4 - Stock Rebuilding Target and Schedule:

This idea seems like another push to lower standards. I think ASMFC should use rebuilding timeline established in Amendment 6.

Given the current state of the stock, this question is alarming. There are motives at play here that seem to indicate ASMFC is being guided in a direction that does not have the health of the fishery in mind.

Issue 5 - Regional Management:

This idea also seems unnecessary. ASMFC should be using the best available science to figure out how the fish should be managed. My recommendation is to continue using the current model and leave this exploration for a later time. Perhaps a time when the fish has already rebounded and is not being overfished.

Issue 6 - Management Program Equivalency (Conservation Equivalency):

Given the state of the fishery, CE Equivalency should not be part of the management plan. As evidenced by the overfished status, ASMFC should be doing what it can to fix the problem; not allowing states to come up with proposals which will make it more difficult to understand the data/manage accordingly.

Issue 7 - Recreational Release Mortality:

A "9%" release mortality may be something that the ASMFC is going to have to live with, to some degree. This fish is very important to recreational fishermen up and down the coast. Unlike other states to our south, we don't have many gamefish to target. Currently, especially given the state of the Bluefish and Weakfish, we have a situation where striped bass gets the lion share of attention from recreationals. Maybe the release mortality can be lowered a bit through education. But the circle hook mandate is silly and not practical for enforcement. You'd be better off reducing bag limits and season lengths to get the desired outcome, rather than thinking you will be able to save a significant amount of fish by lowering the release mortality percentage. Just not practical in a real-world sense.

Issue 8 - Recreational Accountability:

The question as to "whether or not to institute RHL" as a means to manage the recreational striped bass allocation may be worth considering. But, in my opinion, this question has too many complexities to account for if you are also trying to resolve 9 other issues/questions at the same time. My recommendation is to maintain the current methods for recreational harvest data, for now. Then, once Amendment 7 is accepted and passed, this issue can be investigated with the proper effort and attention, in an addendum.

Issue 9 - Commercial Allocation:

I don't have a problem with the current percentages of allocation (Recreational/Commercial). Both parties should bear the pain of reduction equally in harvest reductions to allow the fish to get back to a healthy status.

Issue 10 - Other Issues:

Lack of enforcement seems to be the biggest issue that we see on Long Island. Not enough ECOs to effectively patrol the shoreline. I think this issue should be addressed. But not at this time. If you are trying to

resolve/reinvestigate 10 other issues with this Amendment, now isnt the time. My suggestion is to deal with more/better enforcement as a future addendum to Amendment 7.

One last comment, ASMFC always seems reluctant to reduce the season length for striped bass recreational fishing. As many fishermen will note, the fun of catching bass lies in the catch more so than the kill. I think more fishermen would be ok with a reduction in kill season, so long as we can still catch and release them. This would save some fish and seems like a reasonable way to go about fixing the issue of mortality (despite the release mortality issue).

Thank you.

Sincerely,

Albert Albano

601 Chester Road
Sayville, NY 11782

Albert S. Albano
Senior Project Manager
Long Island Rail Road
(516) 523-0894

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Comments

From: James Jewkes <bigjim121165@yahoo.com>
Sent: Sunday, March 21, 2021 5:25 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Raymond Kane; Sherry White; stripercomments@gmail.com
Subject: [External] PID for Amendment 7

First I would like to thank the board for putting together the webinars on the PID for Amendment 7. Emilie and Toni did a fantastic job with set up and presenting and the other board members that answered questions allowed time and were professional in answering everything we had to ask.

My name is James Jewkes I am a resident of the Commonwealth and a member of several different striped bass clubs in the state of Massachusetts.

I have read the PID issued in advance of this time of public comment. I understand the ASMFC's goals for the forthcoming Amendment 7 to the Interstate Fishery Management Plan For wild Atlantic striped bass.

I would like for the commission to adopt a ten-year moratorium on the harvest of striped bass. Here is why.

The ASMFC's goals, as articulated in the PID, are, "To perpetuate, through cooperative interstate fishery management, migratory stocks of striped bass; to allow commercial and recreational fisheries consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock; and also to provide for the restoration and maintenance of their essential habitat."

A ten-year moratorium will achieve these goals. It is the ONLY approach that has thus far been proven to achieve these goals. And, after thirty years of compromises, half-measures, and slow response to the steady decline of striped bass stocks, I believe that if the Commission is serious about restoring striped bass to healthy abundance and with a balanced age structure necessary for sustaining the fishery for the long term, you will agree with my assessment.

As we know, striped bass have the capacity to replenish their numbers if left alone. If the Commission adopts a ten-year moratorium as I suggest, it will be able to take credit for doing the right thing and acting boldly to achieve its objectives. It will be able to use that ten-year period to adopt better means for collecting the data necessary to maintain the fishery after the moratorium is lifted, and it will have the satisfaction of seeing the focus of a robust, multi-billion-dollar economy flourishing once again.

If the ASMFC doesn't put forth a ten year moratorium, we will once again revisit these same problems as we have in the past.

PLEASE DO WHATS RIGHT FOR THE FISHERY

Thank you
James Jewkes

Sent from my iPad

Comments

From: thoude3320 <thoude3320@aol.com>
Sent: Sunday, March 21, 2021 4:22 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Amendment 7

To whom it may concern,

Striped Bass are an important fish for commercial, recreational and for hire anglers. Please be sure to do all in your power to use any data to come up with a solution that benefits all the stakeholders equally.
As a recreational anglers I will do everything in my power to help maintain the the rules and regulations for conserving this important fish.
I firmly believe a statewide coastal mandate is necessary for saving this precious species.
Please make a uniform standard for all states, no exceptions.

Thanks,
Tom Houde

Sent from my iPhone

Sent from the all new AOL app for iOS

Comments

From: Butch Gaddy <butchgaddy@gmail.com>
Sent: Sunday, March 21, 2021 10:05 AM
To: Comments
Subject: [External] Striped Bass PID

Emillie Franke, I'm writing to show support in trying to improve the striped bass fishery in the Chesapeake Bay. I have fished the Bay for probably 50 years and the fishing is a far cry from what it was back in the day. While I believe that all the fisheries have suffered from over fishing and by water quality in the bay I think that the striped bass have declined at an alarmly fast pace.
In addressing this issue, I hope the ASMF will make several changes to the regulations regarding striped bass. While a moratorium would be extreme, this is what brought back the bass in the 1980s. While no one wants to shut down the fisheries this may be the only answer. Another answer to this problem would be to shut down or severely limit the catch of menhaden within the bay. Menhaden are the major food source for the bass and many other species. The menhaden industry has been cited for overfishing their quota and has no interest in the health of the Bay.
Also the commercial fishing using drift nets are depleting the bass all over the bay. The limit on their catch should also be lowered. Recreational fishing brings much more business to the Chesapeake Bay community than does commercial interests.
I look forward to attending the public hearing to see what other friends of the Bay have to say.
Sincerely,
Samuel Gaddy

Comments

From: Cris Bodine <cris@shorthillconsulting.com>
Sent: Sunday, March 21, 2021 8:24 AM
To: Comments
Subject: [External] Please reconsider amendment 7

Please do not allow Omega to over harvest our precious resources. Bunkers need better protection to allow our native species of fish, and most importantly our strippers, to replenish back to stable numbers. Best scenario is to keep Omega offshore but when inshore, limit harvesting until better data can be obtained and verified. We are seeing a major decline in rockfish, trout, etc and need to stay diligent.

Cris Bodine

Sent from my Short Hill Consulting iPad.
Please note our new business information below.

New address is Short Hill Consulting, Inc., 100 Drum Bay Ln., Hague, Va 22469 New office number is 804-472-7272.

Comments

From: Mark Gagliono <sharkyscove5@yahoo.com>
Sent: Sunday, March 21, 2021 5:37 AM
To: Comments
Subject: [External] Low stripped bass nunbers

Please make the effort to have strict regulations on how many stripped bass can be kept per day. All the states on the east coast must have the same conservation regulations. This all needs to brought up to the highest places in government.
If there needs to be a moratorium for the stripped bass,so be it.What is the best solution that we can do right now to protect these fish??.Sent from Yahoo Mail on Android

Comments

From: Philip McCartney <MCCARTNEY@nku.edu>
Sent: Saturday, March 20, 2021 9:14 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

I have taught mathematics for over 50 years. Lowering standards in education is not a good idea, nor is lowering standards in the management of fisheries a good idea.

Is there a commitment to do what is in the long-term best interest of the fishery based upon the best information available ? How effective have past management efforts been in rebuilding the striped bass population along our country's East Coast ? Can the Board learn from past mistakes ?

Leadership matters and wishing away problems does not solve them.
An example:
According to Johns Hopkins University over 540,000 people in the United States have died due to covid during the pandemic. That is despite the very rapid development of vaccines, and the pandemic is not over.
I believe:

1. The fishery is overfished, even if catch and release mortality is assumed to be only 3%.
2. The Striped Bass Management Board has either been too slow to react or has completely ignored the Amendment 6 management triggers (Pg 49). In 2014, the Board took steps to address fishing mortality but ignored the 10-year rebuilding timeline.
3. Striped bass were declared overfished in 2019, and are still not on track to rebuild within the require 10-year timeline.
4. New Jersey and Maryland failed to meet their required harvest reductions established in 2014 by exploiting conservation equivalency, but faced no consequences. There is virtually no accountability.
5. Recovering the stock, which is currently at a 25-year low, must be discussed and made a priority.

Please demonstrate wisdom and commit to rebuilding the striped bass fishery.

Phil McCartney

Comments

From: Charles Wright <cbturnerwright@gmail.com>
Sent: Saturday, March 20, 2021 7:10 PM
To: Comments
Subject: [External] Striped Bass PID

4) If the ASMFC wants to do more to protect striped bass, without curtailing striped bass fishing mortality, then it should further cut the catch of the menhaden reduction fishing industry. According to the best available science: current menhaden reduction fishing undermines the striped bass population by as much as 28%. (https://www.tandfonline.com/doi/full/10.1080/19425120.2017.1360420)

Charles B. Wright
Lancaster County, VA

Cbtwright

Comments

From: todd corayer <tcorayer@fishwrapwriter.com>
Sent: Saturday, March 20, 2021 4:06 PM
To: Comments
Cc: stripercomments
Subject: [External] Striped Bass PID

Dear Ms. Franke,
As an avid striped bass fisherman of almost fifty years, it's clear to me numbers and sizes of stripers are decreasing in my local waters. This would include the coast of RI and around Block Island where I lived and fished for two decades.
First and foremost, all the Council's movements should be with a primary intent of building abundance in the striped bass fishery. Striped bass are far more valuable in the water than in a cooler or fish case. As a migratory fish, they need your absolute dedication to preserve and build their stocks and consider far less the temporary, localized pressures of single states who cry for rights to kill more fish or act with impunity in the light of a lack of penalty. We need not look back to the last moratorium and very successful rebuilding; with your new evaluations of striped bass, the goal should be absolutely building abundance for the long term, not allowing them to crash just so we can hopefully build them back up once more. This is your chance to be on the right side of Nature.

Striped bass need to be regulated coast wise, without question.

Conservation equivalency shell games should not be allowed when promulgating new regulations to protect striped bass. CE may work well for some species like winter flounder who may move inshore and offshore largely without crossing into other states but bass are on the move. The application of shifting baselines blurs our visions of what abundance looks like while a lack of enforcement or actual consequences has allowed such disgraceful harvests as removing 18" fish from the Chesapeake under the guise of supporting a commercial and recreational fishery. Fish First. Mankind has long made decisions based on our own desires at the peril of animals. I happily fish for stripers with the new slot limit, regretting only it wasn't implement ten years ago and just as happily write Fish Wrap multi-media columns highlighting catching and releasing big females instead of having to show people hoisting dead, fecund breeders on the sterns of boats. Striped bass need to be considered a migratory fish and regulated coast-wise to ensure their protection.
I would not support any reductions in the acceptable striped bass biomass. We need to build abundance.

During my time with MAFMC's Bluefish Advisory Panel, I voiced opposition to any transfer of quota from recreational to commercial fisheries and I would hope that does not become an issue

now. Rhode Island typically does not harvest its full striped bass commercial quota and I would not support any type of quota transfer, be they between groups or states.
Thank you for your time and effort constructing much-needed, updated striped bass regulations. They are a critical species all over this coast and deserve the utmost protection, coast-wide. Fish First.

Sincerely,
Todd Corayer

todd corayer
fishwrapwriter.com
facebook.com/fish wrap writer
twitter.com/fishwrapwriter
www.ricentral.com/timeout

Comments

From: Jason Schumacher <jason.r.schumacher@gmail.com>
Sent: Saturday, March 20, 2021 3:46 PM
To: Comments
Subject: [External] Amendment 7

The ASMFC should postpone Amendment 7 to the Striped Bass Management Plan until a benchmark stock assessment is complete. There is no scientific justification for any of the changes being proposed. While the current management plan is not perfect, the bigger issue is that it has not been implemented effectively. The ASMFC needs to do a better job reducing fishing mortality--not change the goalposts in the middle of the game to account for management failures. This whole amendment should be put on ice until new science is available for management use.

Comments

From: Andrew Bosco <ndrwbosco@gmail.com>
Sent: Saturday, March 20, 2021 11:51 AM
To: Comments
Cc: Stripercomments@gmail.com
Subject: [External] Striper regulations

Dear committee,

Please consider an alternative to preserving the striped bass gamefish. Recreational and commercial moratoriums are adding contributing factors to striper decline. Restricting recreational but not commercial is asinine.
Look to other case studies, like the reddish conservation in the south to alternates of helping those species thrive.

As a former biology teacher, avid fisherman, and current scientist; the ecosystem as a whole is difficult, but possible to sustain. Look to other case studies in the Southeast Asia area of the world where sections of islands are completely preserved to allow the organisms to live naturally and humans consume in specific areas. Again, you could look to how redfish are conserved down south in the USA to maintain healthy populations.

Please consider the future of this species from a natural perspective and economic perspective. The numbers of financial income that game fish bring speak for themselves.

I'd love to be a part of a board or committee to oversee the use of striped bass. Please consider adding me to the list.

Best,

Andrew

Comments

From: Will Raye <willraye@verizon.net>
Sent: Saturday, March 20, 2021 11:12 AM
To: Comments
Subject: [External] Striped Bass PID

To whom this may concern,

As a guide since 1997-98, I have seen the ups and downs of the striper fishery. The direction of the current fishery is not looking particularly positive and as someone who relies on it to make a living, I am concerned.

The present day decline is of similar cause as we saw pre-moratorium, over-fishing. The difference is that there are far more fishermen these days than there were back then. The evidence is clear. Just go look at Stellwagen Bank, the Cape Cod Canal or areas around Monomoy in July. Hundreds of boats with multiple fishermen cover the water. Boat sales just hit a 13 year high according to the marine industry. Many are recreational, some are commercial. Both should be regulated and held accountable.

I know some believe the challenge of addressing recreational accountability is too complex to address now, but I believe it is instrumental in reviving the population of striped bass. The current bag limit is just not a suitable system for the modern age. There are simply too many fishermen for that to work effectively. Technological advances in finding and catching fish along with the massive influx of fishermen, both out of boats and on shore, dictate a new approach.

The reality is, the striped bass is being managed much the same way it has been for the last 40 odd years. The current management process is akin to using a rotary phone vs a cell phone or loran vs gps.

Sometimes, dire situations require drastic measures. A prolific population of stripers is of far greater value economically than the alternative we are facing. Think outside the box, look at other successful conservation efforts and come up with something that is flexible, manageable and effective.

Sincerely,
Capt. William Raye

Comments

From: Joshua Freiberger <joshua.freiberger@gmail.com>
Sent: Saturday, March 20, 2021 10:35 AM
To: Comments
Cc: Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7: Public Comment

ASMFC & Members of the New York State Striped Bass Board,

By way of introduction I am a recreational fisherman out of Montauk, New York. I've been compelled by the condition of the striped bass fishery to comment on the Public Information Document advocating for fisheries management practices that focus on rebuilding the striped bass stock. Please find my position on the issues in the PID below:

1. **Goals & Objectives:** I recommend that this issue be removed from further consideration for inclusion in Amendment 7. I believe that the goal and objectives are not the problem, but instead the fact that the Striped Bass Management Board has not
adhered to them in its actions over the past decade.
2. **Biological Reference Points:** I believe that 1995 is an appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7. The fact that the Striped Bass Management Board has failed to maintain a healthy striped bass stock is not a suitable reason for lowering the goalposts.
3. **Management Triggers:** The four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but may not be an appropriate indicator of such a failure.
4. **Stock Rebuilding Target and Schedule:** I strongly believe that the 10-year rebuilding timeline currently specified in
Amendment 6 should be maintained. In addition, I am strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7.
5. **Regional Management:** Given the combination of current striped bass status and the fact that the science
is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.
6. **Conservation Equivalency:** I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.
7. **Recreational Release Mortality:** I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multiyear study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.
8. **Recreational Accountability:** The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. I recommend the removal of the issue of recreational accountability from further

consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

9. **Commercial Allocation:** It appears that the landings period used for allocation, which dates back nearly 50 years, is woefully out of date. I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery. I also recommend the amendment address the use of gill nets as a means of commercial harvest. I've observed this practice have a negative impact by disrupting migration along south shore beaches and result in significant bycatch.
10. **Other Issues:** I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, which could ultimately inform stock-specific management.

Thank you for your consideration.

Josh

--
Joshua R. Freiberger | (978) 621-7195 | joshua.freiberger@gmail.com

Comments

From: Jack Dobbins <rexydawg@aol.com>
Sent: Saturday, March 20, 2021 10:31 AM
To: Comments
Subject: [External] ASMFC should postpone Amendment 7 to the Striped Bass Management Plan

1) The ASMFC should postpone Amendment 7 to the Striped Bass Management Plan until a benchmark stock assessment is complete. There is no scientific justification for any of the changes being proposed. While the current management plan is not perfect, the bigger issue is that it has not been implemented effectively. The ASMFC needs to do a better job reducing fishing mortality--not change the goalposts in the middle of the game to account for management failures. This whole amendment should be put on ice until new science is available for management use.
2) The current biological reference points are adequate for the management of the striped bass fishery. The problem is that fishing mortality has never been at the right level to achieve the biomass target--not that the biomass target is wrong. Fishing mortality simply must be reduced.
3) This issue is important not only for striped bass but for menhaden too. If the striped bass reference points are lowered, then the new ecological management system for menhaden will allow a larger quota for the menhaden fishery, 75% of which goes to the foreign-owned reduction fishing fleet in Virginia.
The menhaden ecological reference points are defined in the following way:
ERP target: the maximum fishing mortality rate (F) on Atlantic menhaden that sustains Atlantic striped bass at their biomass target when striped bass are fished at their F target ERP threshold: the maximum F on Atlantic menhaden that keeps Atlantic striped bass at their biomass threshold when striped bass are fished at their F target.
Because these menhaden reference points are keyed to the striped bass reference points, if the striped bass reference points are lowered, then a potential cascading effect could occur with fewer menhaden available to feed fewer striped bass.
4) If the ASMFC wants to do more to protect striped bass, without curtailing striped bass fishing mortality, then it should further cut the catch of the menhaden reduction fishing industry. According to the best available science: current menhaden reduction fishing undermines the striped bass population by as much as 28%.
(https://www.tandfonline.com/doi/full/10.1080/19425120.2017.1360420)
-Atlantic herring are overfished. The Ecological Reference Points Working Group and the Menhaden Management Board at the ASMFC failed to take into account the Atlantic herring stock status when setting the menhaden quota last year. If they had, then the menhaden catch would have been substantially lower. That's because Atlantic herring serve as an alternative prey to menhaden for striped bass. The ASMFC must incorporate this stock status information next year during the update assessment process.
5) Unless the ASMFC is prepared to substantially reduce the fishing pressure on important forage species like menhaden, then the ASMFC should postpone this amendment until the Benchmark Stock Assessment is ready for management use in 2025 or later.
6) Thank you for your consideration of these critical ecosystem concerns.

Jack Dobbins

Comments

From: Amberson, Jeff (US) <Jeff.Amberson@flir.com>
Sent: Saturday, March 20, 2021 10:11 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Folks

This past Thursday, I had the opportunity to attend the ASFMC hearing regarding PID 7. I wanted to send you a quick note to express my thoughts.

The following bullets summarize my suggestions on the potential recovery of striper stocks.

- Fisherman up and down the coast recognize that striper stocks are in trouble and need some type of relief
    - This is not a problem that will be solved by one segment of the fishing community. Any solution should involve everyone, the recreational anglers, commercial guys, and the for hire fleet (charters).
    - Enforcement of existing laws and regulations needs to be stiffer
    - I would be in favor of a moratorium on killing fish until stocks recovered. (This does NOT mean an end to fishing, only that any stripers caught would need to be released)
    - The emphasis of the ASFMC should be on the recovery of the fish, and not on any particular stake holder.
    - The Commission should acknowledge, and strive to achieve, their previously stated objectives of rebuilding the stocks of striped bass.
    - I would support an increase in license fees if the associated dollars went toward the goals above.

Thank you for the opportunity to provide my thoughts.

Jeff Amberson
Northborough, MA

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Comments

From: Anthony Vitti <vitti.anthony@yahoo.com>
Sent: Saturday, March 20, 2021 9:03 AM
To: Comments
Subject: [External] Striped bass PID

Doing the right thing involves a balance associated with minimizing unwanted fallout. People find their path in life and spend years mastering the knowledge needed to make hard choices in a path of their choosing and hoping along the way, their best intentions for greater good are achieved.

In this case all of you fine individuals at the asmfc have the honor of profession where the choices you make do affect millions of people.....and the resource we all depend on. God bless our striped bass and thank you for managing them however I'm highly concerned with elements being considered in their on-going effort toward sustainability and abundance. I have many opinions but feel one is the most important of all and it's this.

Please do not consider changing the benchmark.... the variables associated not just with these fish but the ever exploding number of people targeting, harvesting and also escaping enforcement as a result are rising every day this season...and exponentially every year and it is impossible to forecast the continued explosion of recreational angling, which by your own account is responsible for the most mortality. To change the benchmark that resulted in our last recovery at a time when striped bass are at ever growing pressure is drastically changing another variable and the most important one at a time when gathering actionable information is more difficult than ever even based on the variables currently set.

Additionally, the abundance levels at that time have not been duplicated since and I think maintaining a more stable biomas in an unstable environment MUST require a stable and proven approach to regulation on behalf of these fish. Please do not change the benchmark....please protect these fish, people have short memories and commercial or sport entities can target a multitude of in-shore sport fish.... anyone who dosnt want you all to do right by the resource, probably aren't doing right by it them selves and we need you all to stand up for the fish and the anglers who put the health and abundance of striped bass first because in the end it will benefit everyone....even the selfish and short sighted among us all. God Bless you, I dont envy the choices your charged with but I know you'll do what's right as the life choices you made have put you here, in a time and place of decision and a defining moment in all of your careers, all over again. Be well and be safe and thank you for your services.

Regards
Anthony and his so Dominic

Sent from Yahoo Mail on Android

Comments

From: gary cole <trailbiker_72@yahoo.com>
Sent: Saturday, March 20, 2021 6:59 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped bass PID

Dear ASMFC.
My name is Gary Cole, a recreational surf fisherman from Massachusetts I am writing to comment on the amendment 7 PID I have been fishing for striped bass for over 30 years. In that time I have experienced the moratorium and seen the striped bass rebound but in the last 10-15 years have seen their number greatly reduced while this is not something I can back up with science but through my experience and those other fishermen I know. First and foremost I want to say managing for abundance should be the number one priority, setting a goal lower than this I believe does a dis-service to the fish not trying to obtain this goal just because some individuals surmise that it is not attainable dose not mean it is not worth trying.

As far as the points in the amendment are concerned,
1. The goals are good the problem is the board has not acted in good faith with those goals.
2. The biological reference point, lowering the standard is not acceptable. Because we have not done enough to protect these fish is no reason to change the reference point.
3. Trigger I believe the triggers associated with mortality and spawning are appropriate.
4. Rebuilding, I agree with the 10 year stock rebuilding timeline.
5.Regional management , I don't believe this should be part of the amendment it seems to be too complicated to implement effectively in a short time frame.
6. Conservation equivalency , I do not support this; it just provides opportunities for those that don't have the main goals as their priority.
7. Release mortality is best addressed in my opinion though education of proper fish handling.
8. Recreational harvest limits seem way to complex to achieve fairness and accuracy given fish availability in certain areas year to year, should not be part of amendment.
9. Commercial allocation, given the fact massachusetts failed to fill its quota I believe should consider what limits are sustainable.
In addition I believe education about conservation and ethical fishing practices perhaps part of getting a saltwater fishing licence

Thanks for your time and consideration.
Gary Cole.

Sent from Yahoo Mail on Android

Comments

From: Wiechmann, Ralph <ralph.wiechmann@nemoves.com>
Sent: Friday, March 19, 2021 11:41 PM
To: Comments
Subject: [External] Striper

I support a 10 year moratorium on the recreational and commercial harvest of striped bass

Ralph Wiechmann, Realtor
Coldwell Banker Residential Brokerage
cell: (978) 727-2906
fax: (978) 842-4410
licensed in MA and NH
email: ralph.wiechmann@nemoves.com
www.realtorralphw.com



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Comments

From: Sean Davies <sean.o.davies@gmail.com>
Sent: Friday, March 19, 2021 9:57 PM
To: Comments
Subject: [External] Atlantic Striped Bass Draft Amendment 7

Greetings ASMFC team!

My name is Sean Davies and I'm an avid striped bass fisherman based just north of Boston. I'm excited at the prospect of new management policies for the Atlantic population.

For what it's worth, I'd like to add my two cents -- after hundreds, and possibly thousands, of hours on the water, I can confirm that I have seen a dramatic reduction in the Massachusetts population in the past 10-15 years. The past two years have been most dramatic, with days and weeks passing with virtually no healthy population of fish being found in the entire region around Boston, save sporadic catches. I communicate regularly with several of the busiest guides in the area, and these stretches of fish-less days were verified by them, and dozens of captains they also communicate with. It was disheartening, and downright scary at times. This extends to other regions as well -- my wife and I spent a weekend on Block Island last September, and the prominent guide we fished with said that there were absolutely no bass to be found, that we'd be better off fishing sea bass and blues, which we did. How sad!

I think now is the right time to enact dramatic protections for the Atlantic Striped Bass population. I know this is an ongoing debate, but I do believe that the species generates more enthusiasm and economic benefit as a game fish rather than a commercial fish. Between, trips, boating, guiding, and all the downstream businesses that benefit from these as well. I spend time imagining a situation where the bass, bluefish, bunker, (and tuna and whale populations) are brimming in our oceans, and it brings me much joy. However, the reality is that the population feels on the brink of collapse.

Please, on behalf of myself, my family, and countless fisherman in our area, consider drastic protections of this amazing species. The benefits are too many to quantify!

Thank you so much for your time!

--
Sean Davies
sean.o.davies@gmail.com

Comments

From: Cooper Bohner <cooperbohner102@gmail.com>
Sent: Friday, March 19, 2021 2:22 PM
To: Comments
Subject: [External] Striped bass population

Guys the striped bass population is still if anything low. We need to keep it as it. Or if anything tighten the regs.

Comments

From: Emily Woodcock <optom2010@gmail.com>
Sent: Friday, March 19, 2021 10:09 AM
To: Comments
Subject: [External] Striped bass

To whom it concerns,

I support a 10 year moratorium on the recreational and commercial harvest of striped bass.

Emily Woodcock.

Comments

From: Anna Yeganov <akokoreva@gmail.com>
Sent: Friday, March 19, 2021 10:03 AM
To: Comments
Subject: [External] Support on moratorium - bass

Hello -

”I support a 10 year moratorium on the recreational and commercial harvest of striped bass".

Anna Yeganov
MA resident

Comments

From: Bob MacDougall <bobmac62360.com@yahoo.com>
Sent: Friday, March 19, 2021 9:50 AM
To: Comments
Subject: [External] I support a 10 year moratorium on recreational and commercial harvest of striped bass

Sent from my iPhone

Comments

From: Mike Burke <mikeburke28@gmail.com>
Sent: Friday, March 19, 2021 9:45 AM
To: Comments
Subject: [External] Striped Bass Moratorium

I support a 10 year moratorium on the recreational and commercial harvest of striped bass.

Thank you,
Mike Burke
Ashland, MA
mikeburke28@gmail.com

Sent from my iPhone

Comments

From: Dave Cannistraro <davecannistraro@gmail.com>
Sent: Friday, March 19, 2021 9:35 AM
To: Comments
Subject: [External] Support a 10 year moratorium on the recreational and commercial harvest of striped bass

To Whom it may concern

I Support a 10 year moratorium on the recreational and commercial harvest of striped bass.

I am an avid striper fisherman from Littleton Massachusetts. I own a center console and fish boston harbor. I am looking to purchase a new
$100,000 center console boat and my wife said why are you buying the boat if you think all the big stripers will be gone in a few years. My wife is the bread winner so all my purchases go through her. The amount of money put into the economy because of a healthy striper fishery is huge. Boat manufacturers, dealers, marinas, lure and rod makers/builders, charter guides, bait shops $$$.

Striper is not that great of a meal!!!

The excellent striper fishing in Boston Harbor is the last enclave of big fish left in New England besides block island. And because of that boston harbor is getting pounded with commercial pressure (pointless for commercial guys to fish anywhere else, especially now the canal is closed to them) and recreational pressure. I caught 10, 30-40lb fish last year and two of them got hooked in the gills even though I was using circle hooks, have a expensive net to protect their slime and gills, I handle and revive the fish as best as possible and despite that two of these fish didn't make it, a third one was questionable.
The release mortality of these bug fish is way higher than your numbers represent, and on top of that they are exponentially higher egg layers, so way bigger contributors to the population remaining healthy. The release mortality of recreational fishermen (especially in the canal) is enough to damage the population, let alone commercial guys harvesting 10 large stripers on commercial days.

I support increased licence fees to increase enforcement, education, anything to preserve our fish. Every one of my fellow anglers agrees with me, not sure why the comment was made last night that no one supports increased fees, if that's the attitude at your organization we aren't going to save these fish.

Thank you for your time

Dave Cannistraro
Littleton Ma

Comments

From: Paul <tok67@verizon.net>
Sent: Friday, March 19, 2021 7:13 AM
To: Comments
Subject: [External] Striped Bass PID

Good Morning,

I would like to add some additional comments to go on record after attending 2 of the recent Striped Bass Webinars.

1.• Provide a management plan that strives, to the extent practical, to maintain coastwide consistency of implemented measures, while allowing the States defined flexibility to implement alternative strategies that accomplish the objectives of the FMP. **There needs to be full consistency along the Atlantic seaboard**
• Foster quality and economically viable recreational, for-hire, and commercial fisheries. **Massachusetts needs to create a commercial with an annual start end date July 4 to Sept 1 with 2 Days with no adjustment until the stock has rebounded. Regardless if the quota is met**

NO CURRENT LICENSED LAWS OBIDGING RECREATIONAL OR COMMERCIAL FISHERMAN LICENSED FISHERPERSON-LICENSE BE NON-REWENDED IN ANY FISHERY REGARDLESS OF THERE CATCH LIMITS. DISCRIMINATORY.

3. I SECOND THE MOTION FROM THE ISSUE PRESENTED 3/18/2021 ABOUT THE ISSUE THAT NEEDS TO BE FIXED IN MARYLAND -DELAWARE - ALL FISH MUST BE OVER 28" NOTHING LESS. AMENDMENT 5??? NO REGIONAL FLEXIBILITY

4. THE SEALS ARE A PROBLEM ON CAPE COD-THE SEALS ARE HERE IN FULL FORCE AND HAVE DEPLETE THE CAPE COD FISHERIES-JULY & AUGUST. THE SEALS ARE NOT DOMINATE IN THE CAPE COD CANAL FORGING ON THE BASS THERE IN THE LAST 3 YEARS. FOR AN OFFICIAL TO SAY THIS IS NOT AN ISSUE, IN NOT IN TOUCH WITH THE FISHERIES. THE MAIN REASON WE HAVE A GREAT WHITE SHARK ISSUE IS THE FACT THEY ARE FOLLOWING THE FOOD-SEALS. THE EXPLOSIVE SEALS POPULATION OVER THE LAST 10 YEARS -FOLLOWED THE FOOD STRIPED BASS.

5. THE COMMISSION IS NOT PROACTIVE AS WE ALL HAVE MENTIONED. THEY SLOW ACTIVE AND/OR REACTIVE TO THE CURRENT ISSUE. THE FIX NEEDS TO START TODAY.
WE ARE GOING DOWN THE SAME ROAD AS CODFISH, WOLFFISH, AND HALIBUT. TRYING FINDING THESE FISH NOW!!!!!!!
Please refer to tables #3 and 4-here the proof.

6.The Atlantic Striped Bass FMP uses a quota system to manage the commercial fishery. Each state from Maine to North Carolina is allocated a commercial quota in pounds of fish for harvest in the ocean region. T**HIS NEEDS TO BE UPDATED WITH THE MOST RECENT DATA.now!!**
a PERFECT EXAMPLE IS THE MASSACHUSETTS FISHERIES WE CANNOT CATCH THE QUOTA AS THE FISH ARE NOT HERE. REACCESS AND LOWER THE THE QUOTA UNTIL THE FISH HAVE REBUILT. MOST OF THE FISH ARE NOT EVEN SOLD IN THIS STATE.

7. I heard the mention of a license fee hike, I would second this ONLY if the fee went to exclusively putting another officerial in the field. No one ever talks about the number of illegal fishermen. taking fish. I believe your mortality numbers are not aligned with the fishing activity. They are way larger numbers.

8. Also we hear a lot about treble hooks- I believe treble hooks on lures do not harm the fish. I would agree that any hook using bait does so the circle hook debate should be enforced among all baited fisheries.

Thank you all for your time.
There are no winners-especially the Striped Bass population.
I speak for myself as a recreational and commercial fisherman.

I personally think, along with most others I heard on the call, Regulation needs to be updated for 2021, not 2022 to help speed up the rebuild.

Paul Tokarz
3-19-2021

Comments

From: Owen Baldwin <oebaldwin@icloud.com>
Sent: Friday, March 19, 2021 12:05 AM
To: Comments
Subject: [External] Striped Bass

Hello,

Please consider this my attestation to the efforts to preserve the striped bass population.

Kind Regards,

Owen Baldwin

Comments

From: William Nicholson <sirunick@comcast.net>
Sent: Thursday, March 18, 2021 8:30 PM
To: gary.nelson@ma.gov; Comments
Cc: Jack Creighton; Pete Geiges; Dick Nicholson
Subject: [External] Re. PID striped bass fishery

I have many concerns and suggestions but didn't want to clog up the lines.

I think we all know that the fishery is under stress so I won't go there.

Suggestions to further restrict both the commercial and recreational anglers:

Commercial: Adjust the quota annually to below the quota from the previous year until 1995 goals have been met and do not add more opportunities to harvest ie. more days to fish
restrict terminal tackle to single circle hooks. Eliminate umbrella rigs, electric reels, fish pens. More enforcement. I like the "don't move the goal posts" comment.

Note: Mercury levels are higher in bigger fish. Should their sale possibly be regulated or eliminated?

Recreational: Single circle hooks only, including on lures. No trebles. Umbrella rigs only if barbs are crimped. Encourage the use of barbless hooks, crimping barbs. A good fisherman can land a fish without the aid of barbs on their hooks. More enforcement. More education.

Note: I have found that fishing live bait (mackerel) even with a circle hook, it is very difficult not to gut hook the fish. I have tried hooking the bait in different places but nothing seems to be perfect.
Consider eliminating live bait fishing. I hate to say it!!

Great comments by Matt the MD guy! Crack down on Maryland!!

Thanks for your work! I know you are trying to do the right thing. A ten year moratorium sounds extreme. Maybe we can get there in five! But as they say "Go big or go home." Think about our grandchildren...

Best,

Nick

William Nicholson
Member Cape Cod Salties Sport Fishing Club-non-profit.

Comments

From: Emilie Franke
Sent: Thursday, March 18, 2021 8:23 PM
To: Comments
Subject: FW: [External] Striped Bass Amendment 7 Public Information Document Hearings

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: Luciano Mascari [mailto:luciano.mascari@gmail.com]
Sent: Thursday, March 18, 2021 7:30 PM
To: Emilie Franke <EFranke@asmfc.org>
Cc: luciano.mascari@gmail.com
Subject: [External] Striped Bass Amendment 7 Public Information Document Hearings

Since commercial fishermen are catching mostly the large breeding females is there any plans to enact some sort of “slot range” for commercial fishermen? E,g, if recreational is 28-35” should we do commercial fishery slot be something like 35-43” and let the really big breeders move on freely to more quickly replace the biomass. I also know that quality of eggs may go down with extremely old females so I’ll leave it up to the science to what that slot range should be.

Comments

From: Emilie Franke
Sent: Thursday, March 18, 2021 8:22 PM
To: Comments
Subject: FW: [External] MA striped bass assessment meeting of March 18, 2021

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: K.R. [mailto:qquest1@yahoo.com]
Sent: Thursday, March 18, 2021 8:14 PM
To: Emilie Franke <EFranke@asmfc.org>
Subject: [External] MA striped bass assessment meeting of March 18, 2021

Hi Emily,

Thank you for your web meeting on March 18, 2021 and for your efforts in general. I choose to make my questions/comments by email rather than during the meeting. I am a recreational fisher. My first question is related to many I heard in your meeting. In my opinion, education a a key subject.

1) What public information vehicle do you plan to use to spread information, particularly among recreational anglers? Be advised that the only vehicle with which I have recently received information is via a fishing club to which I belong. Fishing club members are a small minority. I recommend generating a mailing to all holders of salt water fishing licenses from time to time, perhaps yearly. In lieu of a mailing, I recommend an information link attached to the yearly fishing license renewal, a link through which one must pass and which one must acknowledge in order to move forward in the renewal process. In particular, I anticipate massive confusion about use of circle hooks (e.g., live bait only, placed on artificial lures, offset circle hooks, etc.) Also note that, many times, I have seen novice fishermen take very small bass; I believe that many just did not know the legal size limits. Suggested topics for public service announcements (circle hooks, size limits, how to catch and release properly)

2) I heard that you do track deep water and shallow water striped bass with acoustic trackers. Do you track the percentage of deep versus shallow by year? Due to ocean warming, it makes sense to me that a larger percentage of bass are moving offshore and/or northward into cooler water every year. I recommend keeping track of deep versus shallow percentage by year. (I am retired and have a background in sonar - perhaps you need volunteers.)

3) What is the ratio of total striped bass biomass removal (including mortality) to total striped bass biomass for any recent year, e.g., 2018 or 2019. Is the total removal a significant percentage of the total? Above what percentage does an increasing drop of the total biomass result in following years?

4) Can enforcement be increased in Massachusetts? I have been fishing the shore and by boat in MA for about 6 years. I have never seen any enforcement at all. Please promote higher license fees to improve enforcement. Also, as you know, those over 65 pay zero fees. Please promote fees for all ages.

5) I heard comments about the impact of seals. I believe that you stated that the impact by seals is minimal. I am skeptical. Note that there is a larger population of seals not only in MA, but also in ME. Please consider the issue of seals. Please promote changes to the marine mammal protection act. I have read the act and I find it to be ridiculous.

6) I heard comments indicating large bass generate a larger number of eggs produced. You probably know that, as of 2020 in MA, we adopted a slot limit with a 35 inch max. Until hearing today about the importance of large bass, I was not aware of that particular importance. Please consider proper slot limits for all states with which you are involved.

7) Please eliminate conservation equivalence.

8) Please promote zero recreational harvest of striped bass; i.e., catch and release only. At least a long moratorium.

9) Please eliminate all treble hooks; they are truly viscous. At least eliminate double and triple treble hooks.

10) I just heard a comment about someone recreationally landing over 700 fish last year. omg. There is no need to anyone to land 700 fish. Is there a way to eliminate that possibility? Perhaps a fish log-in requirement. Why not just throw plugs with no hooks if you have such and addition to fishing? Sorry, but I am horrified. I do not approve.

Thanks again for all your efforts.
Kermit Robinson
Massachusetts

Comments

From: Bob Burger <bsqared@sbcglobal.net>
Sent: Thursday, March 18, 2021 8:17 PM
To: Comments
Subject: [External] Striped bass PID

Hello-

I want to urge the Commission to work to restore the striped bas fishery to its prior level of abundance. From 2001 to 2012 the fishery was in great shape and fishing was fantastic. Since that time it has continually declined to a point where it's just not worth trying anymore; prior measures to help conserve the fishery have been too little and too late. Make this the year that the ASMFC actually fulfills its duty to the public fishing community! Restore the fishery!!

Thanks

Bob Burger
Guilford CT

Comments

From: anthony morales <nektonear@gmail.com>
Sent: Thursday, March 18, 2021 7:11 PM
To: Comments
Subject: [External] Request for Data Morone saxatilis: Spawning Biomass Data, Scientific Trawl Data: NJ to Narragansett Bay Last 10 years

To Whom Will Read this

There is an email being circulated, seeking comments regarding constructing future policy for Morone Saxatilis.

Introduction:

Empirical observation 1991 2021 Westerly RI, the autumn migratory patterns of teleost.

.

Empiricall visual calculation of the aggregate migratory teleost of the aforementioned local has shown a steady decrease as to density and duration.

A socio-economic employed metric the "lure find" frequency. Also showing precipitous decline. Both declines have been concentrated within the last 7 years.

Opinion:

The deline in teleost biomass is not a linear biological relationship. The decline of top tear teleost predators is the result of a severely compromised trophic foundation, thus it is a systemic issue

To solve this current condition, that of the aggregate biomass decline will require strict cooperation from all coastal municipalities. Harvest rates and protected areas still remain the key strategies.

I look forward to continued and in depth discussions concerning this issue.

Sincerely

Anthony Morales

Comments

From: G2W2
Sent: Thursday, March 18, 2021 5:35 PM
To: Comments
Subject: Fw: [External] For monroe saxatillus to be recreation only

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From: John Perrone <johnjpperrone@gmail.com>
Sent: Thursday, March 18, 2021 5:17 PM
To: G2W2
Subject: [External] For monroe saxatillus to be recreation only

I a for Monroe saxatillus to be a recreational fish only, population is on the decline and we need to step up proper release methods for recreational fishermen, heavy fines to those who fail to do so. I think the high price for the striped bass at restaurants and fish markets is drawing this "appeal" to catch what they couldn't catch and land on the beach, they can purchase for a premium at restaurant and make themselves feel good about it.
I fear that the bass population is on such a decline it will cause me to reschedule vacations. Living in MA I would travel to other states, hire guides, in RI, NY, CN, even Places inside Ma, i always purchase food and other necessary logistics to enjoy my vacation within that area I'm in to help out the economy. If the bass fishing stays this poor I feel I am going to spend my money elsewhere, I know I'm not the only person to do this so I feel the economy would do better when the striped bass population increases

Sent from my iPhone

Comments

From: DM Rather <dantonedog@aol.com>
Sent: Thursday, March 18, 2021 1:41 PM
To: Comments
Cc: Emerson Hasbrouck; James Gilmore; Maureen Davidson; Sen. TODD KAMINSKY; stripercomments@gmail.com
Subject: [External] Comment on Striped Bass Amendment 7 PID

Dear Sirs & Madams,

As a recreational Striper fisherman for over thirty years in and around NY, NJ, and CT, I have a personal stake in the management of Atlantic Striped Bass. I think it is fair to say that all the stakeholders in this fishery — recreational and commercial fisherman, and the myriad of businesses who depend on and benefit from the pursuit of Stripers, such as fishing gear manufacturers and distributors, hotels and motels, gas stations, restaurants, convenience stores, et al. — agree that the Atlantic Striped Bass fishery is in trouble and urgently needs to be restored.

From that perspective, I offer the following comments on the Striped Bass Amendment 7 Public Information Document.

There is no need to reconsider **Goals and Objectives.** Healthy and abundant Striper stocks benefit all stakeholders. This is well represented in the Amendment 7 PID and the issue should be removed from further consideration.

As to **Biological Reference Points**, 1995 remains a fit reference point. I fished through that period and beyond, and 1995 was a year in which the Striper stock, finally after a long period of decline and indeed collapse, was indeed again healthy and abundant. 1995 was not some freak "outlier" year, but a return to what can, and should, be considered normal in our Striped Bass fishery. I support the continued use of 1995 as the biological reference point.

In my opinion, the **Management Triggers** are reasonable. There is, however, some cause for concern regarding the standards of recruitment failure under Trigger 5, which might well be revisited.

I am strongly of the opinion that the **Stock Rebuilding and Target Schedule** should remain at 10 years. It is self-defeating, and inconsistent with our shared goals and objective, to extend this timeline while our struggling Striped Bass stocks continue to decline. We all want and need the restoration of the Striper stock to health and abundance as soon as possible, and now, two years in on the ten year period, there is still time to meet the schedule. There is no compelling, or even legitimate, justification for delay. This is also exactly why a Rebuilding Plan should be implemented immediately.

Regional Management may be somewhat appealing in the abstract, but given the poor overall condition of our Striper stocks, and the absence of accurate region-specific scientific data, this is a waste of precious time and resources at this point.

All consideration of **Conservation Equivalency** should be removed. It is, and will continue to be, only misused as a work-around to avoid meaningful restoration of our Striper stocks. Where employed, it has been a disaster, a black hole with no real data or accountability, and no penalty for abuse. If we can remove only one issue from consideration in Amendment 7, let it be this.

Recreational Release Mortality and **Recreational Accountability** are legitimate concerns. Yet, already underway are mitigation efforts such as circle hook requirements and educational outreach, as well as ongoing scientific studies to inform decision making. These evolving issues, which apply not only to Striped Bass but all gamefish (I am also an avid trout fisherman and pursue other saltwater species), are premature for consideration in Amendment 7, and should be tabled so as not to distract from the goals and urgency of restoring our diminishing Striped Bass stocks.

Commercial Allocation is an issue of equal legitimacy. My own observations and anecdotal evidence lead me to believe that the commercial harvest is no longer accurately monitored or measured, and that we would all benefit from an updating of the methods and standards for measuring and allocation of commercial catch.

I hope these comments are helpful in furthering mutual "win-win" efforts toward the shared goal of all stakeholders, to restore Atlantic Striped Bass stocks to health and abundance.

Thank you for your consideration.

— DJ Rather, NY, NY

Comments

From: Lukacs, Charles Jonathon - lukacscj <lukacscj@dukes.jmu.edu>
Sent: Thursday, March 18, 2021 12:07 PM
To: Comments
Cc: stripercomments@gmail.com; STEVEN G. BOWMAN; Patrick Geer; MARTIN GARY; Monty Mason; Bryan Plumlee; Capt. Chris Newsome
Subject: [External] Comment on ASMFC PID for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

ASMFC and VA Striped Bass Board members,

With the Striped Bass population at a 25-year low, I would like to make a comment on the PID for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.
The Striped Bass Management Board has set great goals and objectives. However, has not adhered to them in its actions over the past decade. Here are some of my main comments I'd like to point out.
1- While some states may choose to implement CE programs, there needs to be a way to hold these states accountable if they fail to meet conservation objectives.
2- The biological reference points should remain the same. We should focus on the state of recovery for striped bass. Lowering the goalpost and focusing on improving more recent data on the striped bass population is a bad idea. Good conservation practices can help restore the state of the fisheries to the populations from many decades ago.

Thank you and I hope these comments are considered to help ensure that one day my future children, and their children, will have the ability to cherish the striped bass fisheries we fish today.

Charles J. Lukacs
BBA - Computer Information Systems
James Madison University 2020
Mobile: (704)682-7069

Comments

From: joshua feil <outlook_077048360F268036@outlook.com>
Sent: Thursday, March 18, 2021 11:42 AM
To: Comments
Subject: [External] The future of striped bass

I would like to voice my opinion on this matter. It is imperative we protect this species for the next generation and others to come. I have been an avid fisherman for many years and seen a strong decline in the fishery, even within the past 15 years. Futhermore, The economic data points to the fact that this fish is a valuable resource that cannot be squandered for minor commercial gains by the few, but rather serves as a linchpin of much larger recreational market, and more importantly a vital component of the treasured ecosystem that is LIS. If we are constantly going to lower the bar on conservation, it's a slippery slope, and our children and their children will pay the price. I would like to see more protections and enforcement for those protections from Ct and all other states to prevent further damage.

Sincerely,

Joshua Feil
CT resident

Sent from Mail for Windows 10

Comments

From: Daniel Simas <djsimas15@gmail.com>
Sent: Thursday, March 18, 2021 10:57 AM
To: stripercomments@gmail.com; Comments
Subject: [External] ASMFC DRAFT AMENDMENT & PID

To whom it May Concern,

I participated in last night's (3/17/21) RI webinar and was impressed with the overall support.

As a recreational fisherman and a father who enjoys teaching my children how to fish I think it's extremely important to address the decline of the striper population. I believe most fishermen (both recreational and commercial) want the sustainability of the fishery but as in many situations it's the few percentage of people that are not being compliant, are abusive and overfish or don't respect the current laws that ruin it for everyone else. I have seen 1st hand in the early spring poor release of achilles from the shore or on bridges. I've seen illegal harvesting of undersized fish, and the tactic of catching multiple fish and bringing them up to their cars. All of which I've reported to RIDEM and MA Fisheries and only in the rarest of occasions seen enforcement. It's a disgusting and glutiness behavior and can only be described as selfish. I grew up during the 1980's moratorium, and the benefit of the late 1990's era, but it should be a top priority to react quickly.

Because this is a migratory species, I think it is incredibly foolish to manage the Striped Bass population and fishery through regional state management, the potential overfishing and damage that can be done in one state' waters within the fish's migration in my opinion is one of the problems we are seeing. It's also the reason some states are still seeing good numbers while other states are seeing the aftermath. I think the Biological reference point should currently remain at the 1995 year to ensure a healthy striped bass stock.

Though I'm not directly against further fishing education, a Striped Bass Stamp initiative, or an expanded license or certification, I am still lery that this will correct the striped bass dilema, It may simply put more regulations and cost to the fishermen and women that are trying to do it properly. As I mentioned before, people that are going out for "meat", arent going to register or take an educational class, arent going to utilize circle hooks, if they know they aren't going to get caught.

I do love catching fish and 98% of the time its catch and release, I absolutely love eating fish and when it comes to stripers I will only keep a legal fish that I was unsuccessful to revive and swim away. I only charter with captains that don't take stripers and see the importance of restoring the fishery for future generations. I think striped bass in this state is more important as a sport fish than table fare, so for the betterment of the species I'm all for stricter policies for both recreational and commercial fisherman.

Comments

From: cory w gmail <cwilli06@gmail.com>
Sent: Thursday, March 18, 2021 9:52 AM
To: Comments
Subject: [External] Striped Bass PID

Good Morning,
Please save our Stripers. I have 3 young boys who love to fish and I want them to be able to experience the joy that I have had and that they have had early in their lives by being able to fish for this wonderful species…

Let other fish be table fare and give the Striper a chance to replenish… The economic facts are also clear that the fishery extends more economic benefits to the atlantic coast from sport fishing than from commercial or recreational taking of of fish (tackle / tackle shops, boats, charters, gear, coastal communities who benefit from fisherman visiting seasonally etc).

Having taken many charters before, there are too many captains who are hellbent on taking fish from the water just to give clients a souvenir… while the slot limit is better than nothing, it will decimate the population of this last big year class who are crucial current /future spawners.

Additionally, there is a lot of uneducated anglers who take fish regardless of size limits or bag limits… a more restrictive set of regulations (say, All catch and release) would additionally aid in the population recovery by providing no grey areas. There are so many other fish that are great table fare -> I think we should look at what Florida did to rebuild Tarpon and Snook stocks -> let's keep the fish in the water and off the table.

The movement is loud and the drumbeat is for conservation of our resources including our Stripers … Please do what you can to protect this vital resource which provides ultimate joy and thrill for adults and kids a like.

sincerely,
cory williams
CT resident.

Comments

From: Michael Hagen <horses53@verizon.net>
Sent: Thursday, March 18, 2021 8:21 AM
To: Comments
Cc: hittinger@rissa.org
Subject: [External] AMENDMENT 7

I support RISSA's position on Amendment 7.

Regards,

Michael Hagen
RISSA Member

Comments

From: Richard Nicholson <dick@oystercove.com>
Sent: Thursday, March 18, 2021 12:06 AM
To: Comments
Cc: John Duane; Jack Creighton
Subject: [External] For Amendment 7 to IFM Plan for Striped Bass

This is the short version. I am 79 years old and have been fishing 73 of those years. I am acutely aware of the linkages between “forage" species like Menhaden, Herring and Squid targeted for food by gamefish, seals, birds and humans. I have seen the Striped Bass population go up and down over the decades. (Also Bluefish)

I don’t ignore the issues of released fish mortality, treble hooks, targeting juvenile “Rockfish” in MD and VA and “bycatch” mortality by commercial fishermen. And, of course, the gross decimation of Menhaden by the Omega factory fleet at the mouth of Chesapeake Bay, primary spawning grounds of Striped Bass.

It is obvious (to me) there is a direct linkage between the health of Menhaden and Striped Bass populations. Please give Mother Nature a chance to work here for the benefit of Striped Bass, Menhaden and the entire Atlantic Inshore Fishery.

Richard Nicholson, Member Cape Cod Salties Fishing Club Wellfleet, MA 02667

Comments

From: anthony Gennaro <AnthonyJGennaro@hotmail.com>
Sent: Wednesday, March 17, 2021 9:50 PM
To: Comments
Subject: [External] striped bass let anglers take 2 slot fish and return the larger breeders and stop the taking of 14 inch fluke by netters

Sent from Mail for Windows 10

Comments

From: Tony Tully <tony.tully1313@gmail.com>
Sent: Wednesday, March 17, 2021 9:33 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass PID

It is very clear that striped bass (and bluefish) stocks have been down over the past few years. Whether it be from commercial fishing or recreational fishing, there is a lot that can be done for the species in Massachusetts, and the entire east coast for that matter.

My love for fishing started as a kid casting out a bobber and shrimp from my grandfather's dock in Florida. All the great conservation efforts for the different species down south, specifically snook, have resulted in a booming fishery for recreational anglers. The northern states could learn a thing or two from these efforts.

Enacting the use of circle hooks for bait fishing and banning the use of gaffs on shorts are the equivalent of putting a bandaid on bullet wound. The changes don't have that much of an impact overall. Banning commercial fishing in the Cape Cod Canal last year was a important as enforcement has its limitations, and poaching has been a significant problem recently. Instituting a slot limit also is extremely vital and I commend the state for doing so. That being said, there needs to be some consistency. If recreational anglers are to abide by the slot, commercial anglers should follow the same regulations. And this isn't to say commercial anglers are the route of all evil here. Recreational anglers are just as accountable for stocks being down. Many still need to learn about proper catch and release tactics to reduce mortality rates.

Taking all of this into account, the state should be able to develop a more detailed plan to preserve the species. Anglers, tackle shops, and lure builders alike have been doing their part to spread the word and educate. I hope the state of Massachusetts can do their part too in order to improve the current status.

I have nothing financially to gain from striped bass. If anything, the mere existence of striped bass has made me a much poorer man. I am just another average, every day guy who spends a majority of his paycheck on rods, reels, and lures. And I am okay with all of that. I just hope that someday, when I have kids and then they have kids, that they too can have the ability to develop a love for fishing like I did on my grandfather's dock.

Thank you for your time,
Tony

Comments

From: Chase Clarke <crclarke21@yahoo.com>
Sent: Wednesday, March 17, 2021 8:50 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

To whom it may concern,

I share the concern of many that live in New England surrounding the crisis we are experiencing with the striped bass population. Action needs to be taken immediately to insure the future of these fish and I support any measures that save these fish.

Chase Clarke

Sent from my iPhone

Comments

From: Mike Burns <michaelpaulburns@gmail.com>
Sent: Wednesday, March 17, 2021 8:36 PM
To: Comments
Cc: stripercomments@gmail.com; Justin Davis
Subject: [External] Comment: Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

Dear Commissioners,

Regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass, I would like to comment to support the views of the ASGA. I am not a guide, nor know many, but as a resident in Mystic who loves to surf fish in CT and RI, and have done so for the past 27 years, I have witnessed the striped population come to a level that is in the poorest state during that time. I also go out on friends boats quite often. We catch 100's of bass and all but a couple go back into the water. Let's have a moratorium for some years to help these fish to recover. The guides are for it, recreational guys are for it, thats 90% of the catch. No brainer. Please help save this fishery.

Respectfully,

Mike Burns
225 Old Evarts Lane
Mystic, CT 06255

Comments

From: John Perrone <johnjpperrone@gmail.com>
Sent: Wednesday, March 17, 2021 6:43 PM
To: Comments
Subject: [External] Comment

I'm a recreational fishermen and spend a lot of money to fish for striped bass, I live in MA but travel to, ME, NY, RI and make a particular effort to spend money in the areas I fish to support that local economy. I feel like we need to keep the striped bass recreational only if the most keep slot limit the same. If the striped bass population keeps declining I feel like I will stop traveling as much as I do and I feel like I am not the only one

Comments

From: Frank Huza <fjhuza@gmail.com>
Sent: Wednesday, March 17, 2021 2:17 PM
To: Comments
Subject: [External] Striped Bass PID

In order to effectively grow the stock, the harvesting of pre-spawn Striped Bass should be banned. I am familiar with the Hudson stock and can say from experience any fish captured between March 1 (the current season opening) and June 1st has not spawned. After spawning, the season should open to allow the harvesting of slot fish as determined by the ASMFC. I am not familiar with the egg producing cycle of Striped Bass, so I suggest that the season for a directed fishery for these fish end when they start to produce eggs for the next spawning season.

Sincerely,

Frank Huza
43 Beacon Lane
Aberdeen, NJ 07747
fjhuza@gmail.com

Comments

From: Michael Savage <michael1savage@yahoo.com>
Sent: Wednesday, March 17, 2021 1:15 PM
To: Comments
Subject: [External] Regarding striped bass regulations

The current and possibly proposed regulations increase the number of deaths of striped bass as undersized fish are released and it increases the number of breeding females that are caught. New regulations should allow the keeping of an undersized fish as the daily limit. This would reduce the number of released fish with subsequent mortality and would reduce the number of large breeding female fish which are the source of future stock. The current regulations result in too many injured but released fish as the angler is forced to continue looking for that big cow that is legal.

Additionally, work needs be done to assess where the majority of the new spawn is produced. If, say, the most productive breeders are in the 32 to 48 size fish then they should be protected and the larger trophy fish still be allowed to be taken. But regardless, too many injured fish are returned to the water while the angler searches for his legal fish resulting in more mortality.

Comments

From: PASQUALE MIELE JR <patamiele@comcast.net>
Sent: Wednesday, March 17, 2021 12:02 PM
To: Comments
Subject: [External]

I would recommend follow the science as established in the 10 year striper plan. we need to take the date from the state of Massachusetts on release mortality before making any amendments to article seven.

Thank you

Pasquale A. Miele
Rochester, NH

Comments

From: Emilie Franke
Sent: Wednesday, March 17, 2021 11:57 AM
To: Comments
Subject: FW: [EXTERNAL] : Striped Bass Amendment 7

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: Lengyel, Nicole (DEM) [mailto:nicole.lengyel@dem.ri.gov]
Sent: Wednesday, March 17, 2021 11:28 AM
To: Emilie Franke <EFranke@asmfc.org>
Subject: FW: [EXTERNAL] : Striped Bass Amendment 7

See below.

Thanks!

Nicole Lengyel Costa
Principal Biologist
RIDEM Marine Fisheries
3 Ft. Wetherill Rd.
Jamestown, RI 02835
Office: (401) 423-1940
nicole.lengyel@dem.ri.gov

From: Rick Rheinberger <rick@aiminsco.com>
Sent: Wednesday, March 17, 2021 10:50 AM
To: Lengyel, Nicole (DEM) <nicole.lengyel@dem.ri.gov>
Cc: stripercomments@gmail.com
Subject: [EXTERNAL] : Striped Bass Amendment 7

Good morning;

I wanted to comment in general on the captioned amendment. As reference, I caught my first striped bass in 1967. I have seen it all as they say. The rebound of striped bass in the ’80 was nothing short of spectacular. Hard to imagine that we could make the same mistakes twice but here we are. AFSMC needs to protect the fishery which has been obvious for years now. Commercial interests continue to hold sway over the outcomes and the bass fishery suffers. The recreational fishery is far more valuable that the commercial and yet they rule the day. I have been a proponent of slot limits for years (happy I got to see them put in place). It’s really quite simple, you can’t focus mortality in the fishery on the brood stock and have a healthy population. Some progress has been made and I thank you for that. Much more needs to be done. I hope you will focus on the bass first. I healthy recreational and commercial fishery depend on it! Thanks for your time and consideration.

Regards;

Rick Rheinberger
Sr. Vice President
Affiliated Insurance Managers, Inc.
935 Jefferson Blvd., Suite 2001
Warwick, RI 02886
(401) 352-3000 x222
(401) 352-0020

EMAIL: rick@aiminsco.com

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Comments

From: Scot Calitri <smcalitri@gmail.com>
Sent: Wednesday, March 17, 2021 10:55 AM
To: Comments
Subject: [External] Striped Bass PID

I grew up in a family of commercial and recreational fishermen. My poor timing and the challenges of the striped bass in the 70s and 80s resulted in almost 10 years without a single striped bass landed with multiple days a week of applicable fishing. We nearly lost the entire species, and we did lose a decade. We can't risk this again. We have the power and knowledge to have a continuously healthy stock of striped bass. Mother Nature will give us ups and downs, we cannot exploit these fish again.

A live fish, spawning or maturing toward spawning is far more valuable than a dead $2 / lb commercial fish caught and sold by a part time commercial fisherman.

Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you for doing the right thing for our fisheries. In this day and age, there is no reason that we shouldn't have overwhelmingly healthy stocks.

- Scot Calitri
603-868-1061

Comments

From: MARK Vatousiou <mvpv88@comcast.net>
Sent: Wednesday, March 17, 2021 9:03 AM
To: Comments
Subject: [External] PID Comment

Please add my comment on striped bass management plan for Massachusetts and the Atlantic Coast.Having lived through the roller coaster up and down populations of striped bass through the 1970's and 80's,the boom of the 90's and early 2000's I can attest to the success of a moratorium.I see no reason why as fisherman we can not sacrifice five years of catch and release fishing,no retention,including commercial fishing, to help restore the population.With all the dangers the young of the year face in the Chesapeake,we must do what we can as fisherman to help ensure fishing for future generations.Climate change,rising ocean temperature,acidification of the ocean,lack of prey,and increased fishing pressure, all are working against the population.Let's do what we can to protect the resource before it is too late,shut the keeping part down,5 year catch and release fishing only,no retention of striped bass.

Mark Vatousiou
97 Granger Dr.
Feedinghills, MA 01030

Comments

From: Clark Family <lakeshoreclarks@yahoo.com>
Sent: Wednesday, March 17, 2021 8:42 AM
To: Comments
Cc: stripercomments@gmail.com; Jason E. Mcnamee; KURT BLANCHARD; Sen. Susan Sosnowski; DAVID BORDEN; Eric Reid; Nicole Lengyel Costa
Subject: [External] Atlantic Marine Fisheries Commission (ASMFC) Comments on Upcoming legislation

Hello,
I am a RI resident and 12 year RI home owner. I fish recreationally by kayak, shore, and power boat. I have seen significant declines in the numbers of striped bass over the years and I support additional regulation and limitations on thier consumption commerically and recreationally. Please help support this.

Sincerely,
Cory Clark, Ph.D.
10 Montaul Rd.
Charlestwon, RI, 02813

Comments

From: Thomas Nethercott <tnetherc1@gmail.com>
Sent: Wednesday, March 17, 2021 8:03 AM
To: Comments
Cc: stripercomments@gmail.com; Dennis Abbott; RITCHIE WHITE; Cheri Patterson; KEVIN SULLIVAN; Sen. David H. Watters
Subject: [External] Striped Bass Comments

To whom it may concern,

As a University of New Hampshire graduate and now New Hampshire resident, I spend most of my time during the summer fishing for striped bass. This has been the case for the past 8 years that I've called New Hampshire home. Over this time, there has been an obvious decline in the fish population. Not only are fish of all sizes less common, but large breeder size fish are noticeably absent. This has been a trend that I've noticed gradually over the years. While I'm no expert, I try to fish for striped bass roughly 50 times each year. This has allowed me the opportunity to observe this change.

During my time at UNH, I wrote a paper on commercial fishing management. As part of this project, I was required to interview three professionals within the field. After meeting with these three, it was evident that everyone shared the same opinion. Change needs to come. Fish populations are noticeably down after years of overfishing. Even commercial fishermen were saying this. Many of their complaints revolved around not the local fishing fleet, but boats from the south and from other countries. They all told stories about how these companies have no regard for the law, and how much law enforcement lacks.

There needs to be a complete pause on keeping striped bass, both commercially and recreationally. I love to cook and I love the taste of this fish, but this is a desperate time. Give the population a chance to recover and let's reconsider our options at that point.

Thank you,

Thomas Nethercott

Comments

From: nhlombardi <nicholashenrylombardi@gmail.com>
Sent: Tuesday, March 16, 2021 10:45 PM
To: Comments
Subject: [External] Striped Bass PID

Please do not expand commercial fishing quotas and days. They're going for something that doesn't exist, that will only further decimate the remaining population. These fish take 15-20 years to reach the size limit for commercial anglers! They're just not there anymore!!!
Also, the amount of money spent by recreational "catch-and-release" anglers on gear alone is far greater than that spent on striped bass caught commercially. I don't know ANYONE who buys striped bass at the market, and I live on Nantucket! I spend nearly $4,000 annually on tackle and gas just chasing these things around! And our community is strong, stronger than it's ever been before. Millions and millions of dollars annually.
Catching these fish is so dear to us. They help get us up in the morning and through the work week, they help us pass the times when it gets stressful, they just make us better people and productive happy citizens.
Please consider this when making your decision!

Comments

From: Edward Steinfeld <edward_steinfeld@brown.edu>
Sent: Tuesday, March 16, 2021 9:50 PM
To: Comments
Cc: Jason E. Mcnamee; DAVID BORDEN; Sen. Susan Sosnowski; Megan Ware; Stephen Train; Sen. Dave Miramant; stripercomments@gmail.com
Subject: [External] Comments on PID for Amendment 7 to the Interstate FMP for Striped Bass

Dear Commissioners:

I am writing to comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan for Striped Bass. My primary residence is in Providence, RI, and my secondary residence is in Harpswell, ME. As a lifelong recreational angler for striped bass in the waters of both Narragansett Bay in Rhode Island and Casco Bay in Maine, I am a strong supporter of responsible and sustainable fisheries management. I appreciate and applaud your ongoing efforts through the Interstate Fishery Management Plan.

With respect to Issue 1, I strongly support the goals and objectives of the Atlantic Striped Bass Fisheries Management Plan (FMP) as established by Amendment 6 in 2003. I see no reason to change or otherwise revise these goals and objectives.

With respect to Issue 2, I believe that 1995 should remain in place as the appropriate year for the Biological Reference Points (BRPs) in the FMP. I do not see a clear empirical argument for why the current reference points are unattainable. The 1995-based BRPs define the right goals for the FMP, and we should continue to strive to meet those goals.

With respect to Issue 3, I believe the current management triggers are adequate.

With respect to Issue 4, I strongly believe that the 10-year rebuilding timeline defined in Amendment 6 should be maintained. Moreover, a rebuilding plan for Atlantic Striped Bass should be initiated as soon as possible.

With respect to Issue 5, given the relative dearth of available data, I believe that stock-specific and regional management of the striped bass fishery is inappropriate, and should be removed from consideration in Amendment 7.

With respect to Issue 6, I believe that conservation equivalences should be considered only if striped bass are not experiencing overfishing. States that do implement conservation equivalences must be held accountable if their regulations fail to meet required and stated conservation goals.

With respect to Issue 7, I believe greater efforts should be made to educate and inform anglers about best practices for the safe release of caught fish. Addressing the issue directly in Amendment 7 may be premature, since the Massachusetts Division of Marine Resources is in the midst of a multi-year study of the impact of various types of equipment and practices on striped bass post-release mortality.

With respect to Issue 8, I believe recreational accountability pertains not just to striped bass, but to all recreationally-fished species falling under the jurisdiction of the Atlantic States Marine Fisheries Commission. The issue probably should be dealt with in a broader context than just Amendment 7 of the Atlantic Striped Bass FMP.

With respect to Issue 9, I urge the Striped Bass Board to work with the Technical Committee to update commercial allocations so as to better reflect the present-day commercial striped bass fishery.

With respect to Issue 10, I encourage the Striped Bass Board to support research to better understand the contribution of individual striped bass spawning stocks to the overall coastal population. Such research could in the future inform stock-specific management, and ensure the long-term vitality of the striped bass fishery.

Thank you very much for considering this feedback. Once again, I appreciate your efforts to maintain a marine resource that is so vital our coastal ecosystem.

Sincerely,

Edward S. Steinfeld
134 Hope St.
Providence, RI 02906

and

407 Long Point Rd.
Harpswell, ME 04079

Comments

From: Martin Alger <mja41121@gmail.com>
Sent: Tuesday, March 16, 2021 9:49 PM
To: Comments
Cc: WILLIAM HYATT; Sen. Craig A. Miner; ROBERT LAFRANCE; Rep. Melissa Ziobron; Justin Davis; stripercomments@gmail.com

Subject: [External] Comments regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

To Whom it May Concern,

The Striped Bass is extremely important to me and my family. As a recreational surfcaster, the pursuit of striped has become an obsession, and something that brings me great joy. As I've grown in the sport and done it now over quite a few years, I, as many others, have noticed a marked decrease in overall numbers of fish, and particularly larger fish. I am 100% catch and release, so this has nothing to do with fish for consumption - this is just the sport I love! Now is the time to do what is right for the fishery. Listed below are a few points within Amendment 7 that are key to re-building the fishery to a thriving level.

With regard to Biological Reference Points (Issue 2), I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7. Changes to this would be a detriment to the effort to improve the fishery.

Regarding Issue 4 - I firmly believe that the **10-year rebuilding timeline** currently specified in Amendment 6 should be **maintained**, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

As it pertains to Issue 6 - Conservation Equivalency, I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives. HOLD INDIVIDUAL STATES ACCOUNTABLE - don't make wholesale changes that will negatively effect the entire fishery.

Thank you for the opportunity to share my thoughts on this very important issue. I'm hopeful that all voices are heard and that meaningful changes are made that will preserve and eventually improve the Striped Bass fishery that we are all so passionate about. Thank you very much for your consideration.

Sincerely,

Martin Alger

--
Martin Alger
(917) 693-0460 - mobile

Comments

From: RICHARD CASILLI <r.casilli@comcast.net>
Sent: Tuesday, March 16, 2021 9:07 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Sriped Bass PID

Would like to make a short statement. I have surf fished for over 50 years in Northeast for Bluefish and Striped Bass. In regards to Stripers, I witnessed their dramatic decline in 1980's and 1990's; and I witnessed their recovery "somewhat" the last 20 years. I was always Ok with there being a small commercial fishery by rod and reel. However, I now am forced to say it is time to just END all commercial fishing for striped bass. Every change I have seen last few years , including these proposed changes just help commercial fisherman take more fish and the female big breeders over 35 inches. They don't have to use circle hooks like surf casters and they get to take multiple big fish. Is it any wonder, that most surf fisherman are lucky if they even catch one fish of 35 inches in a season. They are slaughtered by the commercial guys and rarely make into the shorelines. We are catching numerous small fish below our 28 inch to under 35 inch slot limit. That has been going on for years and does not seem to change much. The fish we are catching are not getting bigger each year. The commercial people are slaughtering them. I am just totally disgusted with the management of this species and the catering of decisions to just the commercial interests. We have been practicing catch and release for years and are careful handling the fish. But somehow we are to blame for the decrease in fish? That is a joke. Keep letting commercial fisherman take the high number of breeders out of circulation every year- and the problem will get worse. I Oppose these changes. Time has come to give them game fish status. Or a slot limit of one fish per day for everyone(but not breeder sizes) and no commercial fishing!

Disgusted reading the proposed changes.

Comments

From: Jesse Robbins <jrobbins@farbank.com>
Sent: Tuesday, March 16, 2021 4:09 PM
To: Comments
Cc: Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT
Subject: [External] Striped Bass PID

Hello,

Thank you for your hard work on this challenging topic. I'd like submit the following comments in regards to Amendment 7 to the Interstate Fishery Management Plan for Striped Bass:

1. Biological Reference Points: I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.
2. Stock Rebuilding and Target Schedule: I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.
3. Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Thanks again for your work. Please consider the future health of striped bass as you work on this process, and do what you can to restore their populations. It's better to sacrifice in the present to preserve the future.

Thank you,
Jesse

JESSE ROBBINS / *Far Bank Enterprises* / *New England Sales & Community Manager*
8500 Northeast Day Road, Bainbridge Island, WA 98110
TEL (207) 577-2915

Comments

From: Preston Duclos <prestond3@gmail.com>

Sent: Tuesday, March 16, 2021 3:57 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; stripercomments@gmail.com
Subject: [External] Atlantic Striped Bass Amendment 7 PID comments

To who this may concern,

Comments on the Amendment 7 PID are as follows:

Issue 2—Biological Reference Points: I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7. I Also believe that a more field science method is required to assure a thriving stock. Public education of tagging should be encouraged to assist with studies.

Issue 4—Stock Rebuilding and Target Schedule: I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 9—Commercial Allocation: While I believe that commercial fishing is an important aspect of the striped bass fishery, I believe that the commercial allocation of fish should be lessened due to a declining population INSTEAD of increased. This doesn't make any sense. If the overall catch rate is down, there is a problem with the fishery, not with the "arbitrary" quota that is set. The only reason for increasing the commercial quota would be an overpopulation. Harsher regulation to the recreational angler does allow another sector to deregulate for increased profit. This defeats the purpose of conservation.

More steps should be taken by the ASMFC to assure that commercial overfishing is punished and not left unchecked like it has been in the past in the Chesapeake Bay. Overfishing by double the quota is straight up corruption. Especially in the breeding ground for the largest population of striped bass.

Regards,

Preston Duclos
Concerned Angler

Comments

From: G2W2
Sent: Tuesday, March 16, 2021 2:32 PM
To: Comments
Subject: Fw: trophy fish

From: Vincent E. Vetere <vinny@autoexec.net>
Sent: Tuesday, March 16, 2021 9:34 AM
To: G2W2
Subject: [External] trophy fish

As a charter boat owner and captain the new rules regarding striped bass has severely impacted my business. It 2019 my clients were allowed to keep 1 striper over 28 inches.
Most chose to fish for and keep 1 trophy fish greater than 45 inches. There would be days when we return to dock with 6 to 8 trophy fish.
Come 2020 we were allowed none. I think it would be more than fair if we (at least for hire vessels) were allowed to retain 1 trophy fish per trip.
We pay $250 for a charter permit. This used to allow our clients 2 fish per trip. Why do we have to pay for a permit if we get nothing in return. I realize that our permit allows our clients to fish without a fishing license but they are free and very easy to get even on short notice.
Please consider our request to allow 1 trophy fish per charter trip this year.

Thank you
Capt. Vinny Vetere

Sent from my Vaserizon, Samsung Galaxy smartphone

Comments

From: Irina Tolstoy <tolstoyirina@gmail.com>
Sent: Tuesday, March 16, 2021 10:38 AM
To: Comments
Subject: [External] Striped Bass PID

To: Striped Bass Management Board

I live in New York State and spend many days each summer fishing for Striped Bass on the south shore of Long Island. Each year, I contribute to the coastal economy by buying tackle and hiring fishing guides.

The focus of Amendment 7 should be to decrease the mortality of fish not by lowering the reference points. More fish will survive if fishermen are educated on how to handle fish. This could be accomplished through a coastwide education program.

Of the issues in Amendment 7 open for comment, the following are the ones that matter the most to rebuilding the stock.

#2 Biological Reference Points
The reference points should not change at this time. There is no new science supporting a change.

#6 Conservation Equivalency
Conservation Equivalency should not be part of Striped Bass management.

#10 **End Gill Netting coastwide for Striped Bass**

Irina Tolstoy
New York, New York

Comments

From: Shane O'Malley <shane.omalley72@gmail.com>
Sent: Tuesday, March 16, 2021 12:41 AM
To: Comments
Cc: Jason E. Mcnamee; DAVID BORDEN; Sen. Susan Sosnowski; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 Public Information Document

Hello,

My name is Shane O'Malley and I am a recreational fisherman who lives in Rhode Island who also has absolutely zero desire to ever take one of these fish home and would sacrifice anything besides being able to catch them for sport, to increase their numbers. I'm very concerned about the declining Striped Bass numbers and how ASMFC is handling this issue. My thoughts on Amendment Seven are as follows:

WE CANNOT LOWER BIOLOGICAL REFERENCE POINTS. 1995 should be the reference point because there was a healthy stock then with a broad age structure which is critical for spawning success. It only makes sense for this to be the reference point because this was the year striped bass were declared recovered. It should not even be up for discussion.

WE NEED TO GET RID OF CONSERVATION EQUIVALENCY. This system has only allowed for states to avoid regulation which has only caused the death of more stripers. The biggest problem with conservation equivalency is that states have not been held accountable when they have overfished the species. The striped bass stock is at a 25 year low and conservation equivalency is not helping this

WE SHOULD BE MANAGING FOR ABUNDANCE, not managing for harvest/yield.

WE SHOULD BE MORE AGGRESSIVE WITH REBUILDING. we are walking the razor's edge between rebuilding, and collapse.

Shane

Comments

From: Ashanti Jackson <ashanti.jaxson@gmail.com>
Sent: Monday, March 15, 2021 11:15 PM
To: Comments
Cc: stripercomments@gmail.com; Michael Armstrong; Rep. Sarah K. Peake; Sherry White; Dan Mckiernan; Raymond Kane
Subject: [External] Your Striped Bass Fishery

To Whom It May Concern,

As an angler who looks forward to passing knowledge and experiences to future generations, I am committed to ensure we sustain our striped bass fishery. Massachusetts has an opportunity to take the lead and benefit from being the pioneers of change here. I have outlined our concerns and stand with and echo the rhetoric of our community.

Issue 1 - Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 2- Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 3—Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Best Regards,

Ashanti Jackson
916-236-7741

Comments

From: G2W2
Sent: Monday, March 15, 2021 7:03 PM
To: Comments
Subject: Fw: [External] Striped Bass

From: Kdsf Gmail <kellydsportfishing@gmail.com>
Sent: Monday, March 15, 2021 6:42 PM
To: G2W2
Subject: [External] Striped Bass

Please take the management steps to ensure a thriving sustainable fishery. We have witnessed a dramatic change in Striped Bass population in mid to lower Bay, since early 2000s each year there are fewer n fewer fish, seems
Like the resident fish that remain in bay during summer months head way north above Bay Bridge . I feel the Summer season puts too much pressure on fish , considering how they are congregated in large groups and susceptible to over harvest. It should be clear to any person that has experience fishing on Chesapeake and Potomac that a serious issue has been brewing for decades now. The summer season June thru Sept during hot summer temps need to go, also use of live bait and Chum during this time frame needs to go. Live lining spot while fun for people and enjoyed by many does not mean its a good choice as a harvest method during summer . Use of live Spot n chumming has been the down fall of ourResident population, the state of MD is 10 years delinquent on starting to think about Norfolk Spot management,, this has gone on way too long . Using live Spot n chum concentrates fish, causing competitive feeding , fishermen can rotate in and out of locations hours/days/months with feeding frenzy incited each new day with Live bait and chum being used. So i feel its an unfair advantage , with that being said certain user groups will argue we have a creel limit n quotas . So what diffrence does it make how we catch our limit, well it does . Just like baiting waterfowl or other wildgame there are rules n laws that make it a little harder to achieve but not unrealistic for success . So long as the state and PRFC allows public input and stakeholders to provide management advice i feel like conflict of interest and humans blinded by ambition will continue to ruin this fishery.. Sorry to be long winded but i have depended on Chesapeake and Potomac for 35 years to provide for me and family thru Charter fishing , waterfowl guiding etc,, i believe for me to be a good steward and conservation minded user of public resources i think summer fishery needs cut back for all , charters, rec, commercial as well is ending use of live spot,live bait, chum , may not be a popular idea but it will help the resource, . Thanks for allowing my opinion . James Danford

Sent from my iPhone

Comments

From: George Sylvestre <george.sylvestre@sylvestreoutdoors.com>
Sent: Monday, March 15, 2021 4:55 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External]

ASMF Commissioners,

The conservation of striped bass on the Atlantic Coast is not only a matter of each of our own personal responsibility to this precious resource, for those like myself who depend on the ability to guide recreational salt water anglers, its an important part of our livelihood. But most importantly, our actions related to the conservation of striped bass will be our legacy, one that is inherited by our kids and our grandkids. It is very important to me that that legacy is protected and that some day I will stand on the Brewster Flats and point out cruising stripers to my grandchildren. Therefore I would like to strongly argue that 1995 remain the reference year and that the biological reference points remain unchanged. To do otherwise is simply lowering the bar so that we can create the illusion of progress in restoring the fishery. Thats no good for us or the resource. Second, the current 10 year rebuilding timeframe in amendment 6 must be adhered to. We are behind schedule on this and rather than considering loosening up we should be taking stronger measures to meet the original amendment 6 10 year goal.

Thank you for doing the right thing and protecting striped bass now and in the future.

George Sylvestre
Sylvestre Outdoors

Comments

From: dean machado <deanmachado@icloud.com>
Sent: Monday, March 15, 2021 1:45 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7

I'm a recreational fisherman that has fish for 20 years plus.. I believe that the striped bass stocks are declining and changes need to be made.
Goals and objectives- I recommend this issue be removed from further consideration to amendment 7.

Biological Reference points- I recommend this issue be removed from amendment 7.

Management Triggers- I'm in favor of management triggers 1-4.

Stock rebuilding target and schedule- I'm in favor of developing a rebuilding plan for striped bass as part of amendment 7.

Regional management- I recommend removing this issue from amendment 7.

Conservation Equivalency- I believe that CE should only be considered if striped bass are not over fished.

Thank you for letting my voice be heard..
Dean Machado

Sent from my iPhone

Comments

From: Phillip Sheffield <bonefishmon@aol.com>
Sent: Monday, March 15, 2021 12:29 PM
To: Comments
Subject: [External] Striped bass PID

I have grown tired and impatient of waiting for the ASMFC to do what their mission statement says. To protect the future of our Marine fishery. I would therefore favor a moratorium of ten years. Catch and Revive only with limited per day catch counts.

Sent from my iPad

Comments

From: david bixby <dbixby48@icloud.com>
Sent: Monday, March 15, 2021 11:36 AM
To: Dan Mckiernan; Comments
Subject: [External] Re: Striped Bass Amendment 7 Comments

I am commenting on the PID. I began seriously fishing for striped bass about 20 years ago when I moved to Cape Cod. The fishing had been great up until I began to see a serious decline in the past few years. The robust population of the 1990s has dwindled as a result of overfishing. It is time to aggressively rebuild the stock.

I fly fish and rarely kill a fish. But what i witness off of Chatham on the Monomoy Rips and summer holding waters east of Chatham can only be described as a slaughter of the larger breeding population of bass. A few years back you could observe hundreds of boats tightly packed over schools of large bass. The bass didn't have a chance. Last year that school was effectively decimated. It was nowhere to be found. "Keeper" bass so formerly abundant were rare. Commercial fishing has to stop. And charter boats are very efficient at picking off what is left of the larger fish on the rips. Those fish are rarely released. Something must be done.

The following are my comments on the major issues:

Biological Reference Points: The reference year of 1995 is appropriate. Using another year without scientific validation would be purely arbitrary.

Stock Rebuilding and Target Schedule: The 10 year rebuilding timeline as outlined in Amendment 6 should be retained. The rebuilding plan to support this timeline should be implemented immediately.

Conservation Equivalency: This approach should not be used when the stock is overfished, given the empirical evidence shown in some states that it doesn't work.. That is, if CE isused by omen states, there is no followup accountability.

Again, thank you for the opportunity to comment on this important issue. Let's abide by the science and implement enabling objective for a robust long term striped bass population. Short term catering to special interest groups will not rebuild the population.

Sincerely,

David Bixby
24 Geranium Drive
West Chatham MA

Comments

From: Steve <marpha3006@comcast.net>
Sent: Sunday, March 14, 2021 9:48 PM
To: Comments
Subject: [External] Rock Fish

Hello first time writing. I would believe the elimination of all trophy season fishing, the elimination of chunking and other bottom fishing would go a long way in helping save the rockfish numbers. Also eliminate the winter commercial seasons. Trolling only with barbies hooks could satisfy both sides of the aisle. Steve.

Sent from Xfinity Connect Application

Comments

From: ray hamilton <rayhamilton@gmail.com>
Sent: Sunday, March 14, 2021 9:15 PM
To: Comments
Subject: [External] striped bass management

Hello,
I am interested in seeing responsible management of the striped bass population in LIS and along the Atlantic coast such that the bass are allowed to grow in numbers. I don't feel qualified to really suggest how to do this big task. But, the bass population needs to be protected so that they can reproduce, increase in the numbers of keeper sized bass, and provide adequate numbers for recreational fishing. Obviously this suggests that the population must be managed so that some commercial fishing is also maintained. I have only killed and taken home one striped bass in the 20 years that I have been fishing for them. I don't catch keeper sized fish very often but I want the opportunity to fish for them. I do not have to be allowed to kill fish to make it a rewarding fishing experience.

Thanks for your time,

Ray Hamilton
Stamford, CT


Virus-free. www.avast.com

Comments

From: Nicholls, Chris <Chris.Nicholls@FTIConsulting.com>
Sent: Sunday, March 14, 2021 4:53 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC,

I have been recreationally fishing for striped bass for over 30 years. I understand the stock is at 25 year low. This is something I have been suspected for some time, given what I have seen while fishing on my home waters on Long Island Sound, Gardiners Bay and Montauk. Stronger measures need to be taken immediately to help this fish recover, additional commercial and recreational restrictions need to be imposed with better enforcement. While the slot limit was a step in the right direction, it was way too little too late. I do not think this regulation addressed the severity of this problem, there are enough large fish in the population and I do not think smaller fish will ever make it through the slot, which I think will only result in a failed strategy. Aside from the need to protect this great game species, the economic impact on recreational fishing, if there is not a decent bass fishery will tremendous.

I believe we need to go back to the 36 inch limit and commercial moratorium that existed in the 80s and was so essential to brining this fish back when it was in a similarly precarious situation in the 1970s. Thank you for your consideration and for your efforts to help better regulate this critical fish stock.

Sincerely,

Christopher Nicholls

220 Middlesx Rd.
Darien, CT 066820
&
591 Hands Creek Rd.
East Hampton, NY 11937

203.249.5945 mobile

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Comments

From: Hank Slauson <hms@flexaseal.com>
Sent: Sunday, March 14, 2021 2:24 PM
To: Comments
Subject: [External] Striped Bass

Please do all possible to protect these valuable and beloved assets .

Henry Slauson

Flexaseal Engineered Seals and Systems, LLC
Email: hms@flexaseal.com
Toll-free: 800.426.3594
Office: 802.878.8307 ext 140
Direct: 802.857.4503
Cell: 802.238.3100

Comments

From: Gregg Beldock <gregg@bullrockcorp.com>
Sent: Sunday, March 14, 2021 1:07 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern:

I have fished the New England waters for 50 years; as a guide, a commercial fisherman, a recreational fisherman…. The deterioration of the striped bass stock is a crisis, a shame, a preventable disaster.

When are we going to recognize the import, the financial import, the environmental import, the import of the heritage of these great fish, on our culture and our way of life?

It's not complicated. Their forage food needs protection, circle hooks need to be implemented, limits strengthened and enforced…..please act now. The tipping point in these waters I know so well may have passed.

I implore you to act swiftly and with conviction. Protect a species and support a culture, an economy and a lasting legacy.

Gregg Beldock

Gregg Beldock
Bullrock Corporation
145 Pine Haven Shores Road
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"Building a Better World"

Comments

From: Maureen Garland <zgrlnd@aol.com>
Sent: Sunday, March 14, 2021 11:13 AM
To: Comments
Cc: Maureen Davidson; Emerson Hasbrouck; JAMES.GILMORE@DEC.GOV; Sen. TODD KAMINSKY; stripercomments@gmail.com
Subject: [External] Comments on Striped Bass Ammendment 7 Draft

To All Concerned,

I am a very concerned saltwater fisherman. I have been fishing on eastern Long Island for over sixty years. I saw my first striped bass as it swam in two feet of water at a dock in Greenport. I was fortunate later that summer to catch one of those beautiful creatures off that same dock a few weeks later. As you can imagine, it was an amazing feeling for a twelve year old lad.
In regards to the draft of **Striped Bass Ammendment 7,** I am in general agreement with the American Saltwater Guides Association (ASGA). Furthermore, I, strongly, urge the committee to emphasize education and research to reduce mortality. The focus of education should not only be on the recreational anglers but it should include guides and charterboat crews.
I want my children and grandchildren to have the experience of seeing these amazing creatures as they swim in the waters of Long Island. I want them to experience the exhilaration of a blitz in the shadow of the lighthouse in Montauk. Or, perhaps, see the beauty of that massive fish as she swims in two feet of water at a dock in Greenport.

Thank you for the opportunity to comment on this important document,

Frank Garland
917-504-6368

P.S. I vote.

Sent from my iPad

Comments

From: Zahner, Emery <ejz1@williams.edu>
Sent: Saturday, March 13, 2021 3:17 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom It May Concern:

My name is Emery Zahner and I have been working in the commercial fishery for Striped Bass for 5 seasons. Perhaps more importantly, I am an avid sport fisherman who has been surfcasting for them since I could hold a fishing rod.

Anecdotally, I can tell you that fishing has been progressively worse over the recent years. It seems the 27"-32" class fish are extremely sparse and hard to come by. This is so challenging because they are the future of the fishery. Also anecdotally, I have witnessed hundreds of thousands of adult pogies up and down the Massachusetts coastline with not a single Striper harassing them. It seems environmental factors, like baitfish, are not the issue.

Real fisherman who care about their jobs and their oceans are all on the same page - limit the harvest of Striped Bass. There is a common misconception that commercial or charter fishermen want to extract every Striper from the sea. Wrong. We are the ones who want to see the fishery thrive so we can be successful in the years to come and teach our children the joys of fishing.

There is no long term repercussion of stricter limits severe enough to warrant more years of this senseless harvest that is certain to have long term, irreparable consequences.

Thank you,
Emery

Comments

From: mobileweighstation@gmail.com
Sent: Saturday, March 13, 2021 1:14 PM
To: Comments; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Cc: stripercomments@gmail.com; ROSS SQUIRE; geneander@optimum.net; JOHN G. MCMURRAY
Subject: [External] RE: Striped Bass PID

Dear Fishery Managers,

Having spent over 40 years fishing for striped bass I am very concerned of the current status of the fishery as well as the inability of the fishery managers to maintain a healthy fishery for all stakeholders to enjoy. Many of us have seen this downward trend coming years ago and have expressed our concerns to hopefully avert the position we find ourselves in now but as usual, not nearly enough was done. The fishery managers continued to put off meaningful regulations while catering to a few select user groups. The ironic part is some of these user groups are already retired and on their second careers. I have three business degrees, yet their pensions are more than my annual salary but we continue to cater to them and over fish a resource that many others should be able to enjoy for years to come. Please know these past several years have been the worst fishing I have experienced in my lifetime. At least in the 80s we had big bluefish to fill the void the stripers left. Nowadays we have neither and it is all due to the lack of a timely and effective management plan which I cannot comprehend since we went through this same exact issue in the 80s.

As far as the PID goes, my feedback is consistent with the ASGA and the NYCRF associations. My feedback is as follows:

- **Issue 1: Fishery Goals and Objectives** – The goals and objectives are not the problem. The problem is the management boards lack of ability or understanding that the fishery is in trouble and meaningful regulations are needed to resolve overfishing.
- **Issue 2: Biological Reference Points** – These should not be changed. The fact that this is even a consideration is very concerning. We have been down this road before and was able to determine overfishing was the cause and what brought it back was a robust management plan. Many hours were spent developing these reference points less than 20 years ago. This is not the problem. The lack of a timely and meaningful management plan is.
- **Issue 3: Management Triggers & Issue 4: Stock Rebuilding Target and Schedule** – Management Triggers 1, 2, 3 and 4 should remain unchanged; Management Trigger 5 has proven to be ineffective. I suggest altering Management Trigger 5 to include a recruitment failure time period of a 3-year rolling average or 3 out of 5 years. This Management Trigger should also include language requiring the Management Board to take immediate, not discretionary, action. Also, there should be a change made to the current rebuilding timeline that appears in Amendment 6 from 10 years to 5.
- **Issue 5: Regional Management** - Recent research by the University of Maryland's Center for Environmental Science brings into question the assertion made by some states that the Chesapeake is primarily a male dominated striped bass fishery. This assertion is a primary grounding used to recommend the change to regional management. In addition, we are not aware of any peer reviewed studies that support stock-specific or regional management. I suggest there should be no changes to regional management should be considered until there is further research and investigation.
- **Issue 6: Management Program Equivalency** - The issue with conservation equivalency (CE) is not the intent of CE but rather how CE options are managed. States should have some flexibility in how they implement harvest reductions however these options must be actively managed annually, at the state level, to ensure that they meet the intended state-wide fishery management goals. As an example, in Addendum IV, Maryland's CE option failed in meeting two of the stated objectives. After being allowed to present CE options that met a 20.5% harvest reduction as compared to the 25% required of all other states, Maryland's CE option resulted in the

gross overharvesting of striped bass, even at the reduced 20.5% level. The Board was aware of this gross overage and took no action. Additionally, Maryland's CE option contributed to Addendum IV's failure in protecting the 2011 year class. In the future, this should never be allowed to happen again. Each state should be held to meet their harvest reductions and the goals and objectives of an addendum. Until corrections are made in the CE process, no additional CE options should be considered. I suggest that in the event CE options are implemented, any variation 25% or greater from the required harvest reduction should require the state to implement alternative options approved by the Technical Committee that bring that state back into compliance.

- **Issue 7: Recreational Release Mortality** - All issues that can contribute to lessening the number of dead releases should be considered. This includes the use of gaffs, barbed treble hooks, and spear guns. While these options may contribute to lessening the number dead releases, there is nothing that will prove as effective as increased angler education. The ASMFC should investigate providing grants or compelling states to allocate annual funding for coastwide education programs that address:
    - − Importance of building an abundant fishery
    - − Striped bass fish handling best practices
    - − Proper gear and methods
    - − Effective use of circle hooks
    - − Responsible harvesting
    - − Adherence to regulations

I would strongly urge you to consider making this education a requirement built into the Recreational Marine Fishing Registry system when renewing one's license.

- **Issue 8: Recreational Accountability** – I suggest removing this issue from further consideration due to the scope and complexity of determining reasonable figures. My belief is more scientific studies are needed**.**
- **Issue 9: Commercial Allocation –** The landings used for allocation dates back 50 years. It would make sense to looking into updating their allocations to be reflective of today's fishery.
- **Issue 10: Other Issues** – Here are additional suggestions I have that would greatly improve the poor striped bass fishing we have had for a number of years now.
    - Have someone on the ASMFC board that actually represents recreational anglers like myself.
        - That is people who don't mind taking one for the table on an occasional basis but are more concerned with the experience of going fishing and having one where we can all can enjoy.
        - I believe the current representation for recreational anglers is for those that operate the for hire party/charter boats. They do not represent my interests or others like me since they make money off Striped Bass, I do not.
    - Creation of a Striped Bass fishing license as I mentioned under Issue 7.
        - If you are going to participate in the resource, you need to be able to contribute to it. This would pay for better enforcement, science, stocking program, etc.
        - Each person, for hire/party boat operator, commercial fisherman would have to watch a brief one-time video online and take a simple test on the size limits, and importance of conservation for a sustainable fishery, etc.
        - Cost could be $25 a year for private citizens and $100 a year for those that make their money off Striped Bass.
        - Include a sheet to record statistics (i.e. length of fish, weight of fish, number of trips, etc.) that each person would be asked to send in at the end of year. This way decisions can be made from tangible data.
- Stricter laws and penalties to act as a deterrent for those that break the law.
- More enforcement officers.
- Shorter seasons for all (i.e. 5/1 to 11/30) and increase size limits to 32" in known spawning grounds so more fish get a chance to breed and do so more than once.
- Increased size limits and reduce bag limits – 1 fish at 36" elsewhere which worked years ago.
- Implement a tagging system like they have for deer so you can more accurately count the number of fish being culled and could control that number through this system.

Thanks,

Comments

From: Dylan Ferreira <dcferreira93@gmail.com>
Sent: Saturday, March 13, 2021 10:38 AM
To: Comments
Subject: [External] Striped Bass PID

I support the work that is being done to increase the longevity of the striped bass species. I suggest the main concern should be of the species as all must be done to ensure it continues to persist through. If the stock assessment of the species allows for any take (harvest or release mortality), it should be prioritized to recreational anglers first. The ability to fish for striped bass shall not be jeopardized by the financial benefit of a commercial industry. Also, a recreational fishery **could** provide a larger economical impact than the commercial fishery but I do not have data to support one is larger than the other.

I believe there should be zoom/in person hearing discussing the actual regulatory options we must consider.

Thanks
Dylan Ferreira
58-951-1038
Swansea MA

Comments

From: David Duncan Dow <ddow420@comcast.net>
Sent: Saturday, March 13, 2021 9:18 AM
To: Comments
Cc: David Duncan Dow; michael.armstrong@mass.gov
Subject: [External] Striped Bass PID

Dear Emilie Franke:

I am a retired marine scientist from the Northeast Fisheries Science Center and grassroots environmental activist living on Cape Cod. Before retiring in 2009, my duties included serving as the Recreational Fisheries Coordinator in the Northeast; being a member of he New England Fishery Management Council's Habitat Plan Development Team which helped develop Omnibus Habitat Amendment 2; participation in the EPA-lead Waquoit Bay Watershed Ecological Risk Assessment project which found nutrients to be the major human stressor in the watershed and being a member of the EMaX (Energy Modeling and Analysis Exercise) Team which developed a carbon budget for the Northeast Continental Shelf Ecosystem. Recently I listened to the Chesapeake Bay Foundation's webinar on: "Charting the Course for Chesapeake Bay Striped Bass"

When i met with saltwater anglers, they often asked how they could kill more striped bass from discards (i.e. catch & release) than commercial fishermen/.women who targeted this species in state (0-3 miles) or Federal (3-200 miles) jurisdictional waters. I am not sure that they found my explanation of the discard research and differences in effort very satisfying. The revisions in the Recreational Fishing Effort Surveys exacerbated this problem, since Striped Bass are overfished and subject to overfishing mortality. This lead to the ASMFC proposal to reduce fishing mortality by 18% in both the Recreational and Commercial fishing sectors. The CBF webinar had an extensive discussion on the Conservation Equivalency process used by the states to meet the ASMFC target of an 18% reduction in fishing mortality. I haven't followed the CE process in recent years, so that I will let other commenters address this topic.

The CBF was somewhat vague on the process utilized to develop the Striped bass stock assessment and the proposed rebuilding plan to recover the SSB of female spawners and reduce the fishing mortality. In 2020 NOAA Fisheries released the State of the Ecosystem reports for the Mid-Atlantic & New England regions which discussed the effects on warming waters; increased ocean acidity; nutrient enrichment (eutrophication); Summer hypoxia; etc. on managed fish stocks. As Striped Bass and their menhaden prey species change their locations in time and space, it will reduce the "Productive Capacity of Essential Fish Habitat" and increase the natural mortality component of stock assessments. In Nantucket Sound, Cape Cod Bay and the > 52 coastal embayments on Cape Cod, we are already experiencing changes in distribution and abundance of a variety of shellfish (bay scallops and lobsters) and finfish (Gulf of Maine cod; Summer flounder; Winter flounder; collapse of sea herring and their replacement by Mid-Atlantic forage species; etc.). Summer hypoxia from a combination of eutrophication and climate change effects finfish and shellfish in Nantucket Sound embayments and Cape Cod Bay.

Perfluorinated chemicals (PFAS) are found in our marine waters and likely contaminants our seafood which poses seafood safety threats to sensitive human populations (women of child bearing age and kids; oldsters and those with pre-existing conditions whose immune systems may be more susceptible to the COVID-19 virus). Since 30% of our population is over 65 years old, we have COVID-19 infection rates and deaths comparable to the entire state of Maine. The Ashumet Valley Plume from Joint Base Cape Cod has contaminated public and private drinking water wells in Falmouth and Mashpee with PFOS and PFOA above 70 parts per trillion (EPA's Hazard Level). The AVP lies underneath the Yearling Meadows Development where I live in East Falmouth, Ma. and discharges into Waquoit Bay. Ashumet Pond has periodic fish consumption alerts from methyl mercury, while and PCBs from New Bedford Harbor are found in fish in Buzzards Bay. PFAS chemicals are both water and fat soluble which provides different exposure routes and bioaccumulation pathways than PCBs/methyl mercury. The effects of these toxic chemicals on finfish and shellfish is poorly understood with limited monitoring data being available on concentrations/effects on aquatic wildlife.

Cape Cod Towns and Water/Wastewater Management Districts will spend $ 4-7 billion over the next 20-30

years to reduce “Nitrogen Loading” from septic systems via Targeted and Comprehensive Wastewater Management Plans under section 208 of the Clean Water Act. The EPA Waquoit Bay Watershed Ecological Risk Assessment Project showed a relationship between “N” loading from the watershed/loss of eelgrass beds/ collapse of bay scallop populations. This “N” loading has effected Federal EFH components in Waquoit Bay: salt marshes; oyster reefs and eelgrass beds. This calls for ecosystem reference points in the Striped Bass PID & some type of Adaptive, Ecosystems-based Management Approach (A,EbM) to address shifts in “Natural Mortality” and the “Productive Capacity of Essential Fish Habitat”.

The ASMFC; Massachusetts Division of Marine Fisheries; Mid-Atlantic and New England Fishery Management Councils and NOAA Fisheries GARFO (Greater Atlantic Regional Fisheries Office)/Northeast Fisheries Science Center Population Dynamics Branch should work together to explore options in state/Federal jurisdictional waters if the 18% reductions in fishing mortality doesn’t restore Striped Bass populations. The Northeast Continental Shelf Ecosystem its a complex dynamic system with nonlinear interactions which is not at equilibrium because of climate change and eutrophication. Thus the NEFSC Stock Assessments/Stock Assessment Review Committee approach which assumes “Natural Mortality” is constant and ignores shifts in the "Productive Capacity of EFH” may not yield an adequate recovery plan for Stripped Bass. The ASMFC Stock Assessment for Striped Bass should include environmental effects on spawning areas in Chesapeake and Delaware Bays;Hudson River Estuary and shifts in Interactions between Striped Bass and their forage fish species prey.

Thanks for your consideration of these comments.

Dr. David D. Dow

Comments

From: Richard Fleming <Richard.Fleming@umb.edu>
Sent: Saturday, March 13, 2021 8:10 AM
To: Bob Olsen; Comments; stripercomments@gmail.com
Cc: dhw@cisunix.unh.edu; Dennis Abbott; Megan Ware; Stephen Train; Sen. Dave Miramant
Subject: [External] Striped Bass PID

Dear ASMFC Striped Bass Board, New Hampshire and Maine Representatives,

I stand with my good friend Bob Olsen (his email is below) in:

- Conveying the **economic importance of maintaining a strong sport fishery in the northern New England states.** I live in NH, on the Maine border, and with a large network of fly fishing friends, including many in VT, I feel strongly about s**upporting our critical outdoor recreation economies**. It's a very big deal for us.

- Strongly endorsing the developed points below.

I feel particularly strongly about issue 4:

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

And issue 7. Having reviewed the Massachusetts study (ongoing) for its scientific methods and rigor, I believe we need to have that information, while at the same time **promoting among our personal communities a safe C&R and Keep Fish Wet approach to reducing C&R mortality**:

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Best wishes,
Richard K. Fleming, PhD
Freedom, NH

From: Bob Olsen <bolsenvt1950@gmail.com>
Sent: Friday, March 12, 2021 5:32 PM
To: comments@asmfc.org <comments@asmfc.org>; stripercomments@gmail.com <stripercomments@gmail.com>
Subject: Striped Bass PID

EXTERNAL SENDER
To the Striped Bass Board,

Thanks for your time. I ama VT resident who fishes for striped bass several times a year in ME and MA. I contribute to the local economies by purchasing lodging, meals , fishing gear, etc. on these trips. Please consider the following bullets to be my position on the Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of

the striped bass population and fishery.

Thank you for your time and consideration.

Bob Olsen
1612 Shaw Mansion Road
Waterbury Center VT 05677

Comments

From: Rico DiMattia <rico@4109570000.com>
Sent: Saturday, March 13, 2021 7:40 AM
To: Comments
Subject: [External] FW: Comments on a proposed Amendment 7 regards Striped Bass.....

Wanted to share this with you.

Thanks

Rico



REAL ESTATE MATTERS
Coastal
REALTY & AUCTION

Rico DiMattia
410-957-0000
rico@4109570000.com
410-630-3880 (fax)

From: Rico DiMattia [mailto:rico@4109570000.com]
Sent: Saturday, March 13, 2021 7:37 AM
To: 'CAPTAINDENNISF@GMAIL.COM'; 'DAVIDSIKORSKI6@GMAIL.COM'; 'MJDIZE@VERIZON.NET'; 'MICHAEL.LUISI@MARYLAND.GOV'; 'MBRASSIL@HOUSE.STATE.MD.US'; 'BILL.ANDERSON@MARYLAND.GOV'
Subject: Comments on a proposed Amendment 7 regards Striped Bass.....

Good Morning All.

I have read with keen interest the data regards the current state of the migratory Striped Bass population in the Mid Atlantic region.
A fine effort in an attempt to frame present conditions.
Nevertheless I view this moment through a different lens and feel compelled to share an alternate perspective.

So many variables to consider.
Pollution pressure, industrial ag, the powerful menhaden harvest, by catch challenges, commercial fishing pressure, squeaky wheel advocating, political ambiguity, all blowing in the wind with inconsistency that comes to these pinnacle moments cyclically. We have been here before.

Enough of the same old rhetoric and V shaped reactions. Enough!
Stay the obvious course of pragmatic efforts targeting sustainability through common sense.

Moratoriums are desperate measures that relate to previous lethargy and power of will to do the right thing ahead of a cataclysmic moment; a failure to govern till it is too late.

My suggestions.

1. Immediately adjust commercial catch for Striped Bass.
2. Menhaden catch limits.
3. Do not give up on pollution control and oversight.
4. Incentivize Striped Bass aquaculture private industry breeding operations to bolster numbers. There is a huge industry opportunity here.
5. Adjust criteria for recreational anglers to enhance viability for Striped Bass.

Moratoriums are draconian and lazy, typical of being asleep at the wheel.
Free enterprise, innovation, technology, awareness and passion will resolve this moment with positivity for the species, economy and the people that relate to the healthy population of Striped Bass in perpetuity.

Thankful to contribute beyond this correspondence.

Rico





Rico DiMattia
410-957-0000
rico@4109570000.com
410-630-3880 (fax)

Comments

From: JOHN SCHNEIDER <crowhunter@me.com>
Sent: Friday, March 12, 2021 6:35 PM
To: Comments
Subject: [External] Striped Bass PID

The bass is worth far more in the recreational market than providing protein for users. Gamefish is the answer.
Sincerely, JF Schneider

Sent from my iPhone

Comments

From: Rob Lee <fishrhinofish@gmail.com>
Sent: Friday, March 12, 2021 2:51 PM
To: Emilie Franke
Cc: Comments
Subject: [External] Striped Bass PID

Hello Emily,

I saw that you are one of the most important individuals to help us with the conservation and necessary changes for the livelihood of our striped bass.

I have been extensively reading and gathering insights from the people that I know and trust on this subject including consultation with the various fishing clubs for which I am a member including the Westport Striped Bass Club (WSBC) where I am the current President, the Connecticut Surfcasters Association (CSA), which I am a member, and the American Saltwater Guides Association (ASGA).

These are my key points and comments that I hope to share that I hope can act as a voice in helping our depleted striped bass population. I remember fishing with my dad from when I was a little boy and the excitement of catching and releasing a striped bass. We need future generations to share this Joy!

Key Points: Goals & Objectives

- I believe that the current goal and objectives of the Atlantic Striped Bass Fishery Management Plan continue to be appropriate for striped bass management. Fish stock stability based on a diversity of age classes promotes long term fish stock health and stability**.**

- *Keeping in mind the suitability of the current goals & objectives for striped bass management, I would recommend that this issue be removed from further consideration for inclusion in Amendment 7.*

Key Points: Biological Reference Points

- *We believe that 1995 remains an appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7*.

- *We cannot lower biological reference points; this will lead* ***to further problems to our striped bass.***

- We should not change the current 1995 reference year that is currently used and was a broad age structure of striped bass and an abundance year.

Key Points: Stock Rebuilding Target and Schedule

- I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained at a minimum with a desire for more aggressive rebuilding.

- Maybe consideration of a 5-year rebuilding program timeline for better accountability might make more sense than the current 10-year timeline.

- A longer rebuilding timeline would not only extend the period during which the stock is not at the target level, but would also inject greater uncertainty regarding the outcome of the rebuilding process.

- *I strongly favor the development of a rebuilding plan for Striped Bass as part of Amendment 7.*

- *We should not be managing for yield/harvest, we should be managing for abundance. We should focus on how many striped bass that we can ensure are alive, not how many we can kill.*

Key Points: Regional Management

- *Given the many combinations of current striped bass status, we should focus on rebuilding striped bass stock with the tools at our disposal, not a fundamental shift or regional management decisions.*

Key Points: Management Program Equivalency (Conservation Equivalency)

- *We should abolish Conservation Equivalency. It allows states to escape regulation and offers no state accountability when they underperform*.

Key Points: Recreational Release Mortality

- *I believe that specific effort reductions can make sense when our fish stock is in decline, (time and area closures) such as reducing the winter fishing by 50% to help reduce fish mortality that seems higher than the 9% catch & release averages for other times of the season.*

For instance, in winter holdover fishing, the fish are weaker, more lethargic, and catching and releasing during these winter months will have higher mortality rates than at other times.

- *Oftentimes, the striped bass are stacked and fishermen are foul hooking and oftentimes snagging these fish.*

These fish are under greater stress in my opinion during these winter months that coincides with higher mortality rates I suspect.

- *Massachusetts Division of Marine Fisheries is in the midst of a multi-year study that will assess the impact of various fishing methods and gear on striped bass mortality.*

We should review this information once available for further insights in our quest to improve the striped bass fishing population stock.

Key Points: Commercial Allocation

- I believe that using landing period allocations, which dates back nearly 50 years is out of date.

- *I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.*

Please help us Emily, we need our Striped Bass Fishery to be healthy for all the Joy that Striped Bass provide.

Comments

From: Kevin Downing <kdowning92@gmail.com>
Sent: Friday, March 12, 2021 2:22 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] PID document comments

Hello,

I have several comments I would like to present with regard to the 7th amendment to striped bass fisheries plan.

Issue 2: I think the 1995 benchmark needs to remain the goal as it is an appropriate representative year. That is the benchmark for restored levels and we cannot go below that. We should strive to far exceed the basic restoration levels. The decline of the fishery is a result of failed management strategies and lowering the bar for the fishery population is not the solution.

Issue 5: I believe regional management needs to be examined in areas such as the chesapeake and Hudson river where large amounts of spawning fish are routinely targeted. Scientific data driven policies and fishing restriction will limit mortality of the breeding stock in these areas which is crucial to the restoration process.

Issue 6: I do not believe given the current state of the fishery that states should be able to utilize CE at this time. I think looking forward, this is allowable if there is definitive data to show there is no overfishing in that region. I think above all else limits and punishments need to be set for states that utilize CE but then fail to meet stated conservation objectives.

Issue 7: I think that the results of the study currently being conducted in Massachusetts will be critical to determining the best path forward to reducing fish release mortality and provide the most accurate percentage assessment to date. I think any gear or other restrictions at this time would be premature and would lack meaningful data to support the changes. That being said, there are without a doubt improvements fisherman can make to reduce this in the immediate future. Efforts must be made to educate and inform fisherman on proper handling, release of fish. If striper fisherman treated caught fish like you see fly anglers handle wild trout, that would without a doubt reduce that number.

Issue 8: I think in order to generate meaningful RHL for stripers, a better way to capture catch data in real time and monitor the recreational side of the fishery would need to be established. I support removing this issue from the amendment as it is far to complex to address within the scope of the goals defined in issue 1. It would take significant resources and time to properly gather the data if an RHL was to be implemented.

Issue 9: The commercial quota allocation needs to be based on a more recent landing period used for allocation. That data is from nearly 50 years ago and is no way shape or form representative of the current fishery. Commercial data should be generated on a new landing quota so commercial quotas are based on data representative of the fishery today.

Issue 10: I feel some additional consideration needs to be given to other fisheries and loss of prey. Menhaden stocks are not what they used to be and as a primary food source this would have a negative impact on the stock. The board needs to ensure it is keeping these relationships in mind when dealing with other species the striper preys on. Predators such as seals and sharks have exploded in numbers around MA, NY and other states in this fishery and I think some assessment of how those impact striped bass populations is necessary going

forward. There needs to be specific standard implemented to ensure commercially caught fish are tagged when caught and verified that they are sold to a commercial broker. Currently in MA only 25% of people holding a commercial license report selling fish. For short money a commercial license can be purchased allowing for the person to catch fish outside recreational limits and keeping them or selling under the table. With current regulation these fish would not be counted under the commercial quota. The potential for this occurrence needs to be removed as 25% is simply far too low to be the real number. I would like to see the board collaborate with states to determine the revenue generated by recreational fisherman to show that our voices matter just as much if not more than the commercial.

Final Comments: The striper population is in a precarious position. It is painfully obvious management strategies in recent years have failed. This truth falls on everyone involved in the fisheries shoulders. Too many fish are being killed. This is the commercial sector, recreational sector whether intentional kill or release mortality. Regardless of the financial impact to commercial fishing, those quotas should be reduced as should the recreational limits. I would in fact support a moratorium but that is unrealistic given the inability for basic management of this fishery. We must ensure everyone involved is killing fewer fish. Commercial fishermen are far outnumbered to recreational so while the actual numbers are skewed away from them, per fisherman they have a much higher percentage of the take. I implore the board to make meaningful decisions to grow the striper population regardless of your desire to appease the commercial fisherman and the lawyers and lobbyist they send to your meetings.

Kevin

Comments

From: Iswann 1993 <iswann1993@gmail.com>
Sent: Friday, March 12, 2021 12:44 PM
To: Comments
Subject: [External] Striped bass PID

Stop any commercial fishing of stripers and mandate the same laws in every state. Bag limit and size limit the same for ALL states
Let's save the fishery now before it's too late , there's too many poachers , they get away with everything there's boats keeping over slot fish all the time call the warden and DEC and no one shows up

Sent from my iPhone

Comments

From: G2W2
Sent: Friday, March 12, 2021 12:39 PM
To: Comments
Subject: FW: [External] Comments on Striped Bass

-----Original Message-----
From: Sam Lambert [mailto:samlambertrealestate@gmail.com]
Sent: Thursday, March 11, 2021 7:29 AM
To: G2W2 <G2W2@asmfc.org>
Subject: [External] Comments on Striped Bass

1 managed the same way in every state
2 use 1995 stock assessment
3 manage the fish for abundance not the people
4 make the hard decision for the fish assemblage
5 know what is actually happening with the fish population through better science population studies, recruitment, distribution in order to make more timely decisions
6 climate change task force for strippers and habitat change

Thanks Sam

SAM LAMBERT, 207-522-7728
samlambertrealestate@gmail.com
KELLER WILLIAMS REALTY
169 Park Row, Brunswick,Me.04011
Residential , Waterfront, & Commercial

Comments

From: blaircaviness <blaircaviness@gmail.com>
Sent: Friday, March 12, 2021 12:31 PM
To: Comments
Subject: [External] Striped Bass

The majority of wild striped bass should be allotted to individual, licensed non commercial fishermen. These people generate huge amounts of side-income in boat sales, fishing equipment sales, restaurant spending, and, overnight accomodations, etc…

The limit for recreational fishermen should at all times be at least 24 inches, and, should never be more than 2 fish per person. Also, since it is widely believed that larger fish are females, slot limits should be encouraged.

There is no way, as the world's population keeps growing, commercial fishing can keep up with demand for fresh Striped Bass without seriously decimating the natural population. Farm reared Striped Bass will continue to grow to keep up with demand.

Also, no conversation about the future of Striped Bass cannot be seriously considered without mentioning Menhaden, the forage fish that Striped Bass, Bluefish depend upon. You cannot hope to increase Striped Bass population, while at the same time allowing for increases in the harvest of Menhaden!

Blair Caviness

Sent from Mail for Windows 10

Comments

From: Preston Southwick <prsouthwick@gmail.com>
Sent: Friday, March 12, 2021 7:51 AM
To: Comments
Subject: [External] Striped Bass PID

My father and I have been striper fishing from the coast and bays of south Jersey for as long as I can remember. I have only caught one keeper sized fish in my entire life (it was released) and my dad hasn't caught a keeper in about 10 years. I am grateful for organizations like this that help protect the species. I am not a biologist, but I think a shorter season or more strict slot limit would help this species immensely. Management should defintiely consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released. I think these fish are worth more alive than they are dead. Angler education is also important, I see way too many people dragging these fish in the sand when they are caught from the beach. If you can handle wading in the water to cast, you can get your hands a little wet to ensure the safety of the fish that you love to catch. There is no way that that is good for the fish, and even if they are released I'm sure the sand does not help their survival chances. I think the second worst thing for a species, behind commercial fishing, is irresponsible recreational anglers. I would also love to see bonus programs eliminated, although I know that is controlled by the individual states and I am not sure what you can do about that. Based on what I have heard, the Chesapeake Bay has a serious chemical runoff problem, creating dead zones that need to be addressed. Since this is a major spawning ground, I think this is the one factor that, if fixed, can help the species more than any other. This fish is a migratory species, so I think it should be managed similarly to waterfowl during hunting season. Also, quotas should definitely be established for the recreational anglers, and commercial fishing should have more strict quotas and better bycatch reduction practices. I would prefer significant changes to rebuild the stock quickly, because this species needs serious help.

Thank you for your time and consideration. Organizations like this one are the reason anglers have access to healthy populations of fish.

Comments

From: Joe Webster <joe@allpointsflyfishing.com>
Sent: Friday, March 12, 2021 7:49 AM
To: Comments
Subject: [External] PID comments

Hello ASMFC,

I am reaching out to weigh in and make my voice heard in regards to the PID on striped bass. There is no doubt that striped bass are in trouble right now. As an avid fisherman, and employee of a fly fishing store on the Maine coast, I can speak to this from first hand experiences. Without copying and pasting a pile of statistics that show this to be true (which I'm sure you're receiving a lot of already), I simply ask that the most aggressive conservation regulations should be put in place for the entire east coast to protect our striped bass fishery. A 10 year moratorium on striped bass harvest for both recreational and commercial fisherman would be a great start.

Thank you for listening

Joe

Comments

From: Cindy Flanagan <cjflanagan33@gmail.com>
Sent: Friday, March 12, 2021 7:38 AM
To: Comments
Subject: [External] Striped Bass PID

To: Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Thank you for taking the time to review my email. My name is Cindy Flanagan and my anglers number is 00085527. I started striped bass fishing last fall when I moved to Point Pleasant, NJ and I have been taught things as I have fished by fellow anglers. I follow lots of online anglers and, after reading the PID, I would suggest instituting that all states follow the exact same RHL guidelines for sizes and bag limits. NJ is 1 at 28-38 with a bonus permit that allows 1 tagged between 24-28. The bonus permit we have is brilliant as I actually got to use mine in December. That fish was a triumph because it was the biggest one I had landed to that point. There is nothing so disappointing as a NJ angler seeing what are clearly what we call shorts being harvested in other states. I am new to the love of striper fishing and I want to see the fish thrive. If the numbers being reported are honest and they fall within the threshold that can sustain the population, then making your RHL mandatory across all fisheries is the best recommendation I have.
Thank you again for your time and your commitment to preserving striped bass stocks!
Best regards,
Cindy Flanagan

Comments

From: Taf Schaefer <tafschaefer@me.com>
Sent: Thursday, March 11, 2021 9:16 PM
To: Comments
Subject: [External] Striped Bass PID

Hello Commissioners,

I'm writing to encourage you to take immediate, long needed and visionary action to save the Striped Bass from overfishing, habitat loss and threats to their health and lives posed by humans and climate change.

I grew up on Cape Cod where boating, fishing and life on the sea were as fundamental as breathing in and out. Striped Bass were an integral part of our lives and we awaited their migration arrival with excitement to be able to see this majestic fish come springtime.

During the early years when we caught Striped Bass to eat I had the great privilege of saving some of the bones from a very large fish and to this day make silver replicas of the bones that I've shaped into bracelets. I also immortalize them in bronze sculptural belt buckles.

Now I only flyfish (mostly with my son, Captain Kyle Schaefer) as catch and release but still find each siting and catch a miraculous event. Their beauty and strength is something to behold.

Surely you must see that some big changes must be made to protect Striped Bass. The current conditions cannot continue under a "business as usual" mindset or falling population levels and habitat destruction will draw extinction nearer each year.

The following are some of the guidelines for protecting Striped Bass.

Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you for adding my voice to the count for saving the Striped Bass.

All the best, Taf Schaefer



34 Front St. #44
Exeter, NH 03833
603.969.3060
taf@tafschaefer.com
www.tafschaefer.com

via Newton Mail

Comments

From: Your average Fish keeper <fishingthepacific@gmail.com>
Sent: Thursday, March 11, 2021 9:00 PM
To: Comments
Subject: [External] Striped bass laws

Hello, I am an avid striped bass fisherman and an employee at a tackle shop on Long Island. Speaking for me and my colleagues we feel that striped bass management has to be focused less on individual private fishermen and more on commercial fishing. Even though those boats have a big voice we hope that our voices can be heard too. We believe that commercial fishing should be eliminated and or limited for the striped bass species. We also agree that circle books should be mandated for bait fishing and single hooks on the back of plugs. Thank you for your time for reading this.

From,

Jacob

Sent from my iPhone

Comments

From: Stephen Madden <stripervision@gmail.com>
Sent: Thursday, March 11, 2021 8:25 PM
To: Comments; jared.silva@mass.gov; dan.mckiernan@mass.gov
Subject: [External] Comment Amendment #7 to the Interstate Fishery Management Plan For ATLANTIC STRIPED BASS

Emilie Franke

Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

To: Atlantic States Marine Fisheries Commission

My Comment to Amendment #7 to the
Interstate Fishery Management Plan For
ATLANTIC STRIPED BASS.

It is with great concern to the future of the Atlantic Striped Bass as a Species first and foremost.
Over fishing from Recreationals and Commercial interests, along with poor fisheries management is abundantly clear!

The Striped Bass are declining once again!

The primary issues considered in the PID are:

1. Fishery Goals and Objectives
2. Biological Reference Points
3. Management Triggers
4. Stock Rebuilding Targets and Schedule
5. Regional Management
6. Management Program Equivalency (Conservation Equivalency)
7. Recreational Release Mortality
8. Recreational Accountability
9. Coastal Commercial Allocation
10. Any other issues concerning the management of Atlantic striped bass

My Comment to PID

I have read and reread all 10 issues presented to me in the PID.

In my best ability as a Recreational Angler for over 50 years, I do not pretend to understand and comprehend all the Science presented to me.
I do understand the enormity of the tasks presented to the Atlantic Fisheries Commision, State Fisheries Managers, Scientists, Biologist who try to adhered to the Sustainable and Cooperative Management of Atlantic Coastal Fisheries!

****THE ATLANTIC STRIPED BASS SHOULD FIRST AND FOREMOST BE RECOGNIZED AS A DECLINING STOCK FISHERY!

****Minimum of a 10-year moratorium on striped bass harvest for both commercial and recreational anglers.

In the last 40 years, striped bass have gone from nearly extinct to relatively abundant along the East Coast. Now it seems the tides are turning once again, and stripers are becoming scarcer than they were around recent peaks in the early 2000s.

**** A Game Fish Status must be imposed on the Atlantic Striped Bass Species!

This eliminates Commercial harvesting!
Allowing more breeder size fish survival, increasing the reproduction of the species.

Recreational catch and release
with emphasising Educational Techniques to Reduce Catch-and-Release Mortality!

Education to the Recreational Fishery is the best way to insure the reduction to Catch-and-Release Mortality!

Above are my comments to how I would like management of the Atlantic striped bass fishery to look in the future?"

Please understand that how the Atlantic Striped Bass are managed now effects the future for all who love this Species as a Sport fish and most importantly a Species!

STEPHEN E. MADDEN
7 SUSAN CIRCLE
CARVER MASSACHUSETTS
02330

Comments

From: Nat Thompson <natpthompson@gmail.com>
Sent: Thursday, March 11, 2021 8:15 PM
To: Comments
Cc: Megan Ware; stripercomments@gmail.com
Subject: [External] ASB Board

To whom it may concern,

I tried signing up for the Maine Dept. of Marine Resources hearing, but apparently I got an e-mail back saying I had signed for the New Hampshire one by *accident*(?). I hope that was not an issue with the dropdown links on the website and I hope others didn't have the same issue. Someone did respond and say they would sign me up for the Maine hearing, but it never happened. Nevertheless;

I am writing as a concerned citizen, a scientist, an angler, a business person and a conservationist.

Please do whatever is necessary to alter the striped regulations and their associated food source accordingly, *to manage for abundance*. We need NOT to manage for sustainable yield, but for the health of the fishery, the way god intended it. The way it was for centuries *prior* to the twentieth century, when migratory fish were plentiful in our rivers and streams.

I don't think people have any idea what the value of this resource is to the recreational fishing industry and to the local economies. Whole seasonal economies are reliant upon a healthy striper fishery. Small seaside communities up and down the eastern seaboard rely on these fish to draw people to enjoy this beautiful species of fish...*responsibly*. We finally have come to recognize the value of the brook trout here in Maine. Please take a page from that book and do the same with the striped bass.

Manage for abundance not for yield!

Thanks and keep up the good work!

Nat Thompson

Nat Thompson
Producer
Greenlight Maine
207-831-8553

Comments

From: fhpeters9@gmail.com
Sent: Thursday, March 11, 2021 5:41 PM
To: Comments
Subject: [External] Striped bass

Hi, I am a teenage angler. At the moment it looks like there is a chance that one I am older I may not be able to fish for Striped bass. I believe that the best way to save striped bass is to do something similar to what Florida does with Snook.

Thank you, Fenton

Comments

From: Emmons Whited <emmons.whited@gmail.com>
Sent: Thursday, March 11, 2021 5:35 PM
To: Comments
Subject: [External] Striped Bass PID

Hi.

My name is Emmons Whited, and I'm a sophomore in high school from Portland, Maine.

I fish for striped bass all through May til November, and they are absolutely my favorite fish to catch. They fight hard, they eat lures with unmatched authority, and they'll pull your kayak if you get them running.

I'm emailing to voice my concern about striped bass management. As of now, with stripers being acknowledged as a species that is overfished, it's vital that we do everything we can to protect these amazing fish.

I hate the idea of thinking that I may never be able to catch striped bass 30 years from now, or whatever span of time it may take for them to vanish if they aren't cared for. I don't want that to be a concern of mine. But it is now, and it's awful. I'd hate to see the population dwindle before my eyes, as a 16 year old.

Thank you for taking steps to keep them healthy. Please consider the future generations of anglers in your decision making.

Emmons W

Comments

From: Aaron Barmmer <barmmeraaron@yahoo.com>
Sent: Thursday, March 11, 2021 5:34 PM
To: Comments
Subject: [External] Striped bass

Hello my name is Aaron Barmmer. I'm from cape cod Massachusetts and I am very worried about the state of the striped bass. I've been avidly fishing for them for a long time and over the past 5 years I've been seeing a huge decline. Thousands of people make a living around these fish here not including commercial fishing /killing them. With out these fish these people will be out of work . These fish have obviously been over harvested and if the rules don't change they will probably be whipped out. In my opinion these fish should have much stricter harvest rules if not total catch and release only coast wide! Please listen to my and 99% of all fisherman's voices!
Sent from my iPhone

Comments

From: Alex Staikos <staikosa22@stlukesct.org>
Sent: Thursday, March 11, 2021 5:27 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

After reading the PID on striped bass populations, I have come up with some ideas that I think would help preserve the population. Over the many years I have been fishing on shore and without a boat, I have noticed that the striped bass fishing has annually gotten worse. There are definitely less fish present which is why I am really glad we are doing something about it. Here are some ways I think we can help

1. require all fisherman targeting striped bass to use barbless hooks for a safer release
2. require all fishermen to use single hooks when fishing with plugs to catch striped bass
3. Prevent the harvest of the striped bass population from occurring for 1 year to help rebuild the population
4. prevent the harvest of striped bass in certain areas of the ocean, especially in areas where bass commonly spawn.
5. change the limit of bass harvested to 1 fish per day instead of 1 fish per day per person

thank you

Alex

Comments

From: Matthias Phillips <matthiasphillips1@gmail.com>
Sent: Thursday, March 11, 2021 3:53 PM
To: Comments
Subject: [External] Striped Bass Amendments 2021

Dear ASMFC,

My name is Matthias Phillips, and as an avid striped bass fisherman in NY, I have firsthand seen the effects that Gill Netting has on the population, across Long Island you can tell when the Gill Netters are offshore because of the lack of fish, after this amount of time that they are out there, there is a plethora of 35+ inch fish, which are crucial for breeding, that wash up dead on the shore. This is because the Gill nets catch everything in their path and kill everything in it, and rather then harvest and be caught with these oversized fish, these Gill netters are more inclined to throw them overboard. This decimates the breeding population of Atlantic striped bass and is frankly unfair considering the limit sizes posted for recreational fishermen. My proposal would be to only allow hook and line fishing of striped bass to decrease mortality of the breeding population. Thank you for your time and I hope this comment finds everyone reading it safe and well

Matthias Phillips

Sent from my iPhone

Comments

From: Rui Coelho <rcoelho@gbtu.org>
Sent: Thursday, March 11, 2021 2:48 PM
To: Comments; stripercomments@gmail.com; Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; KURT BLANCHARD; Jason E. Mcnamee; DAVID BORDEN; Sen. Susan Sosnowski; Nicole Lengyel Costa; Eric Reid
Subject: [External] ASMFC Comments

Dear ASMFC & MA / RI Striped Bass Board

I am a recreational angler and conservation supporter, writing for your support "to do the right thing". My striper angling history goes back to the mid 1970's on Block Island (where I lived year-round) and the fishery was massive compared to today's dwindling stocks. Yes, in those days I sold some of my catch. I am not a fisheries scientist, so I do not want to be prescriptive here. Please do the right thing from a preservation perspective. Addressing both MA, since I am resident, and RI, since I am a landowner.

If I can compare last year's drought in Mass., what did the state do? Declare an emergency. Why? If people did not ration their water usage things would get worse. Several years ago state farmers lost millions of dollars of crops due to a water shortage.

Or maybe another example. Remember the marshmallow experiment with a child - one now or two if you wait? . Scientists have proven that a squid, if given a choice, it will delay an immediate treat and wait 15 minutes for a better snack. So even a squid understands delayed gratification.

So, here we are, the striper population is under threat. It provides recreational joy and commercial income today, but what about the future? Can we delay our urge to catch as much as we can now or preserve it for the future? Do we want that cod fish on the MA state house chamber wall to represent our future fishery or an extinct species?

Thank You.
Rui Coelho
President
Greater Boston Chapter of TU
617-285-1665

Comments

From: Pierrepont, Stuyve <Stuyve.Pierrepont@marsh.com>
Sent: Thursday, March 11, 2021 2:19 PM
To: Comments
Subject: [External] Striped Bass Amendment 7

Dear Commissioners ,

I am an avid sportsman and me and my extended family spend many days on the water. Striped Bass fishing is a key ingredient of our enjoyment, and we are willing to make sacrifices to ensure there are abundant fish in the water and the breeding stock is kept at a STRONG level.

This is the time to be conservative in fisheries management, and I urge you to take all steps to take a conservative approach to fisheries management.

We, as fishermen, commercial & recreational, are very efficient at what we do. Left unchecked ,we have decimated populations of many fish species. We look to you for leadership in management, and Ecological Based Management makes all the sense in the world. YOU are tha last line of defense. Protect our fisheries not only for us but for the future generations.

Please do what you know is right and ignore those that just want to economically strip our oceans today.

Regards,
Stuvye Pierrpeont

R. Stuyvesant Pierrepont III
Locust Valley, NY 11560
917 282 5110 (c)
Stuyve.pierrepont@marsh.com

Comments

From: Kurt Karwacky <kkarwacky@gmail.com>
Sent: Thursday, March 11, 2021 1:26 PM
To: Comments; Patrick Keliher; Megan Ware; Stephen Train; Sen. Dave Miramant; Rep. JAY MCCREIGHT
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Emilie and the Maine ASMFC board members,

Thank you for allowing me to comment on this document and taking the time to read my comments. Below are my official comments regarding the Striped Pass PID for Amendment 7.

I would like to see the striped bass managed for stock health and abundance, not harvest. I would like to see the board address a plan to rebuild the striped bass stock that has already been declared overfished.

Regarding the issues:

Issue 1-The goals and objectives are sufficient and still in line with current fishery needs and objectives.

Issue 2-I'd like to see the BRP remain unchanged. The 1995 data is sound and remains an appropriate reference year. As the stock is in poor health there is no reason to change the BRP until the stock has been rebuilt.

Issue 3- The management triggers are appropriate and should be unchanged.

Issue 4-The current 10 year timeline in Amendment 6 for rebuilding the stock is appropriate and should be maintained. The stock rebuilding and target schedule has not been adhered to as outlined in Amendment 6 and a rebuilding plan for striped bass needs to be initiated immediately.

Issue 5- I support coastwide management of the stock. Given the combination of current striped bass stock status and the fact that the science isn't available to inform stock-specific or regional management, regional management is not appropriate.

Issue 6 - I would like to see CE removed from the management plan. But if it remains, CE should not be considered when the stock is overfished. Most importantly, for the states that use CE, there needs to be accountability when CE measures fail to achieve target goals.

Issue 9- The commercial harvest data needs to be updated and integrated into a new management plan and goal.

Issue 10- The board needs to better understand where anglers are getting value out of the striped bass fishery, to better facilitate quantifying what the goals should be for the fishery.

Again the striped bass stock health and abundance should be the highest priority for Amendment 7.

Thanks,

Kurt Karwacky
Recreational Angler
Brunswick, Maine

Comments

From: Roger Brooks <rogersguns72@gmail.com>
Sent: Thursday, March 11, 2021 5:40 AM
To: Comments
Subject: [External] Striper purposal

I recently read the puposal that you are purporting. I think that is a going to far. If you in Maine to catch and release , that's on you but for you to tell me in NC that I should keep them is ridiculous. I go to Clark's Hill twice a year and keep 10 fish each time. I don't think my 20 fish is putting a threat on the problem. Please keep your socialism up north.

Comments

From: walakai724@gmail.com
Sent: Thursday, March 11, 2021 1:52 AM
To: Comments
Subject: [External] What stripers

I have fished for bass for over 49 years! From boat and shore! Caught 1keeper last year after fishing all summer, so help our future reset limits ! Walt

Wallhullabaloos

Comments

From: Marc Quenzer <mquenzer690@gmail.com>
Sent: Wednesday, March 10, 2021 8:30 PM
To: Comments
Subject: [External] Public comments

We need to protect the good year classes 2015,2017,2018 year class of fish . They are the future. Limits should be set 1 fish at 38” to 45” . Give the smaller fish a few good spawning years.

Sent from my iPad

Comments

From: Christopher Kline <kline.christopher@gmail.com>
Sent: Wednesday, March 10, 2021 8:27 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello,

I am a recreational angler from Massachusetts who is very frustrated about the decline of the fishery, and the fact that the voice of the recreational angler has been largely ignored in the management process.

The striped bass fishery is clearly in precipitous decline and in imminent danger across the east coast. After careful review of the PID for Amendment 7 to the Interstate Fishery Management Plan for Striped Bass, I would like to express my strong opinion as follows:

1. On issue 1, I recommend this be removed from inclusion in Ammendment 7 -- the current objectives and goals are sufficient.
2. On issue 2, I think this issue also be removed from consideration, because the current BRPs based on the 1995 reference year should be unchanged.
3. On issue 3, most current triggers are sufficient. If anything, Trigger 5 may warrant further consideration to address recruitment failure, because the current model relies on three consecutive years and is subject to error due to the random nature of recruitment.
4. On Issue 4: it's critically important to MAINTAIN the 10 year rebuilding timeline, but start it IMMEDIATELY
5. On issue 6: conservation equivalency creates chaos given the fact that striped bass are a migratory species. So long as we allow CE, no plan for rebuilding the stock should be considered coherent and modelable. Therefore I STRONGLY BELIEVE we should ONLY ALLOW CONSERVATION EQUIVALENCY if striped bass are NEITHER OVERFISHED nor EXPERIENCING OVERFISHING.

Thank you very much for your time and consideration.

I hope that, this time, the voice of the non-commercial fishing community is listened to.

Sincerely,
Christopher Kline
44 Forbes Hill Road, Quincy MA 02170

Comments

From: Jack Daley <jack.daley24@gmail.com>
Sent: Wednesday, March 10, 2021 6:57 PM
To: Comments
Cc: Michael Armstrong
Subject: [External] comments on Public Information Document (PID) for Atlantic Striped Bass Amendment 7

Dear ASMFC,

As a Massachusetts resident and aspiring striper angler, I am writing to express my support for stricter regulations on striped bass management on the east coast. I think many people would agree that there is no more iconic east coast gamefish species than the striped bass, and yet without bold action in the next few decades I worry that the fishery will be a shadow of its former self.

One trend that particular worries me is the growing harvest of stripers from charter vessels. These vessels take out thousands of people from spring to fall and almost always harvest a limit of live bass. In addition, I see many recreational anglers harvesting multiple stripers per day, as well as stripers outside of slot limits.

Given the steady declines in striper populations we have seen in recent years, I think drastic actions are needed to preserve the fishery, including:

Ban on harvesting from commercial, charter, and private recreational anglers
Pinched barbs on artificial lures
Enhanced protection, especially during spawning season, for the Hudson and Chesapeake regions.

Thank you for your consideration.
Jack

Comments

From: Mike Piper <mpiper@abramscapital.com>
Sent: Wednesday, March 10, 2021 6:53 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear ASMFC Board Members:

Thank you for the opportunity to comment on the Stiped Bass PID. My family fishes recreationally in Massachusetts and Rhode Island both from shore and by boat.

1) I believe the Goal from Amendment 6 is still appropriate today. If anything has changed it is the number of recreational anglers willing to devote time and money to the pursuit of Stripers. Their economic impact dwarfs that of commercial fishing for Striped Bass. As to the Objectives, maintaining coastwide consistency is still important, especially in smaller states where people frequently fish in different waters. I also think limiting the need for annual changes is still important. Stability is important. And we should not set the abundance target lower just because we've failed at the management to date. We've proven these fish can come back. The objective of minimizing costs of state management seems irrelevant to me. If a state wants to use CE to veer off the path of a using a consistent catch limit, they do so knowing management costs may go up.
2) While the Target may be unattainable, the Threshold seems to be just about right. When we're below that, that's a sign that we need to act. We didn't in 2014 and look where we are now. I also think diverse age structure is more important than numbers of trophy fish.
3-4) I agree that one year of data may not be meaningful enough to call for immediate action. But the board refused to follow their own guidelines they established. No action was taken for years, and there is currently not a 10 year plan to rebuild the stock. Whatever plan is adopted has to include consequences for board members that don't achieve their mission, as well as for states that violate their guidelines.
5) Regional management hasn't worked in the past. Not sure why one would expect it to work in the future. Consistency and stability is more important than flexibility.
6) Conservation Equivalency is a major failure. If the board decides to protect a certain age of fish, allowing states like NJ and Mass to still target them is ludicrous. The data behind the CE calcs is dubious at best. Again, consistency and stability over flexibility / cheating.
7) Gear regulations and education is key in this area. But any idea of reducing effort are misguided, unless there are environmental reasons, such as warm water temperatures. The economic value of a healthy fishery is massive, in the billions of dollars. And if COVID has taught us anything it's that time outside and with family and friends is far more valuable than sitting in an office.
8) An RHL would only be successful if each state followed it. If we could get Federal directives that were mandatory, it might be worth giving up some management stability to get consistency across the whole coast.
9) It makes sense to update the commercial quotas. While fishing technology has greatly improved, in Massachusetts the Commercial fisherman are unable to meet their quota. This implies there are not enough fish and the quotas should be reduced.
10) Research into whether it's advisable to eat Striped Bass would be a good thing. PCB levels may have dropped, but I have yet to see a scientific report on the levels in various spawning groups.

Sincerely,
Mike Piper
Marblehead, MA

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Comments

From: Jay Sullivan <Jay@shannonpartners.com>
Sent: Wednesday, March 10, 2021 2:22 PM
To: Comments
Cc: stripercomments@gmail.com; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] Comments for Amendment 7 to the IFM Plan for Striped Bass

To the ASFMC,

I would like to submit the following comments on Amendment 7 for consideration:

1) I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.
2) I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.
3) Conservation Equivalency should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.
4) Regarding Regional Management, given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.
5) I would applaud the inclusion in Amendment 7 of guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. The Striped Bass Board should support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you,

Jay Sullivan

Jay Sullivan
850 Third Ave, 13th Floor
New York, NY 10022

SHANNON RIVER

W: 212-331-6561
C : 917-715-5349
jay@shannonpartners.com

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Comments

From: Szymborski Steve <szymborskisteve@gmail.com>
Sent: Wednesday, March 10, 2021 1:55 PM
To: Comments
Subject: [External] Stripers and all over fished speices on the east coast

I honestly think they should stop the harvest of stripers,sea trout ,fluke ,Black Sea bass ,tautog , and cod for 3 years you can catch and release but can't harvest I'd love to see what happens.

Sent from my iPhone

Comments

From: wadeh@suddenlink.net
Sent: Wednesday, March 10, 2021 1:46 PM
To: Comments
Subject: [External]

Are the ASMFC members blind or do they just turn a blind eye to the real fish stock problem. I'm 69 years old and have always thought that trawlers should not be allowed in the Pamlico Sound. The commercial fisherman may contribute more money to Marine Fisheries but the recreational fisherman contribute more to the local businesses. It's not about the fish it's about who has the most pull>

Comments

From: James Quinn <quinnjim1056@gmail.com>
Sent: Wednesday, March 10, 2021 12:55 PM
To: Comments
Subject: [External] Rockfish protection issues from fisherman's catch/release

When it comes to shutting down Rockfish season to help the number. Then you close all fishing,catching,touching of Rockfish by commercial and residential.
ALL.
Catch and release needs to be done correctly, and one out of 100 fisherman know how to complete this correctly.
Me and my family had seen too much abuse in this fish and release of Rockfish in the Chesapeake bay. To me, I had seen more fish kills in the last 5 years then then the last 15 years now that fish and release has become fashionable.
Groups come to fishing areas and stay for hours catching and releasing. 20/30 fish per fisherman and then back to next day to repeatedly the abuse using this way of fishing.
Look, you don't allow fish and release of herring and other fish that are in danger of being lost forever. Why allow fish and release in a close season when you will still have fish kills.
A Close Season should be close to all types of fishing to save the species.
If your cat fishing and start hooking rockfish then you need to do the right thing and move to another location, change your bait to be a responsible fisherman.
Thank you. Jim

Comments

From: schiolan@fourquartersinc.com
Sent: Wednesday, March 10, 2021 12:10 PM
To: Comments; Comments
Cc: hbopp10401@aol.com; John Tropiani; pinkavitch@hotmail.com; Bernie Otremsky; rsmolskis@csbuilders.com; PAUL TATE; ttate@lfdriscoll.com; Greg Peifer; R. Scott Senior; Russ Mutlick; squishy305@hotmail.com; Justin Varga; 'ICE GARY HUSBAND'; Bill Ott; Kelly R. Chiolan; Jeffrey Nichol; Pete Cahill; Dave Broyer
Subject: [External] Proposes Striped bass moratorium

To whom it may concern;

It has just come to my attention that Stripers Forever, an organization of recreational anglers that advocate catch and release, has recently made the push for a 10-year moratorium on striped bass harvest for both commercial and recreational anglers.

I want you to know that I am completely against any such moratorium at this time.

We are just now putting into effect the new circle hook requirements, and are on reduced bags limits to address striper population issues. This moratorium is not needed at this time.

Additionally, if they wish to do only do catch and release fishing, that is fine for them to do so. However, they should not be allowed to mandate or dictate what others, not even in their own state should be allowed to do.

Should you wish to discuss this, please feel free to call me on my below cell number anytime.

Steven N. Chiolan
Chief Estimator
Four Quarters Mechnical, Inc.
2601 River Road, Suite # 4
Cinnaminson, NJ 08077
Office: 856 786-7661, ext. 210
Fax: 856 786-9002
Cell: 856 904-8566
E-mail: schiolan@fourquartersinc.com

Comments

From: lmbpl <lmbpl@yahoo.com>
Sent: Wednesday, March 10, 2021 11:10 AM
To: Comments
Subject: [External] Striped Bass

To whom it may concern

There is no reason not to make striped bass a game fish. Stripers almost disappeared in the past.

The economic value of striped bass recreational fishing is far greater then any commercial fishing.

We almost lost them once. Let's not do it again.

SOS. SAVE OUR STRIPERS. USE CIRCLE HOOKS.

Also the striper population will not survive unless you also manage the bait population.

Former striper fisherman.

Paul Lambert
Palm Harbor, Fl.

lmbpl@yahoo.com

Sent from my Verizon, Samsung Galaxy Tablet

Comments

From: Mick Polakowski <mpolakowski@shmarinas.com>
Sent: Wednesday, March 10, 2021 10:30 AM
To: Comments
Subject: [External] Comments from Striped Bass Webinar on 3/9/2021

I listened to the webinar yesterday afternoon and just wanted to follow up with some comments.

I am a recreational fisherman and aspiring guide, in Maine. I fish more than most recreational anglers, since I work on the water and have easy access to my boat. First off I would like to mention, that the board should really listen to the guides in every region. They are the ones that probably have the best opinion on the state of the fishery and how to improve it. They have the most to lose and gain from it.

I would like to agree with the comments, in relation to a standardized bag limits and regulations for the entire Eastern Seaboard. Including the Chesapeake Bay region. This is probably my personal biggest issue, with the fishery, at this point in time.

I question how you acquire the data of mortality rates of released fish? How do you know?

I would like to see the Charter Head Boats, have their own category of data or be put into the commercial side of things. This was mentioned last night and I agree that this should be separated from the recreational data.

In Maine the bag limit on striper has changed at least 3 times in the past few years. Why is this? Has this impacted the fishery and how would you know? I thought the 28" minimum was the perfect bag limit. Personally I am not opposed to catch and release for a couple years, to rebuild this stock.

I am a firm believer in non-offset circle hooks for live bait fishing techniques.

Thanks again for listening and holding a public forum for this. I believe everyone involved only has the best interest of the fishery in mind and wants to see it thrive.

Mick Polakowski
Technician
Safe Harbor Great Island
O: (207) 729-1639

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Comments

From: Galen R.D. <22229dancerguy@gmail.com>
Sent: Wednesday, March 10, 2021 10:14 AM
To: Comments
Subject: [External] Striped Bass PID

Hello, my name is Galen Donovan, and I am a recreational striped bass fisherman.

I want to add my voice to the comments regarding the Atlantic Striped Bass Fishery Management Plan amendment 7.

I would like to say that I am in full support of the organization Stripers Forever in their push to make striped bass a game fish, and put a moratorium on the harvest of striped bass across all states where striped bass are caught.

I believe their(the striped bass) value is much greater in the way of a sport fish than table fare, and I think that if things continue in the direction they have been going in recent years, everyone, commercial and recreational striped bass fishermen alike, will be hurt in the long run by striped bass being overfished.

The species is in decline, and there needs to be something done about it!

Please consider mine, and all other comments, supporting Stripers Forever in their goal of getting striped bass qualified as a game fish, and ultimately putting a moratorium on the commercial and recreational harvest of striped bass.

These fish are something special to so many people, and they need to be protected and helped to come back so that people can enjoy the sport of catching them for generations to come.

Thank you for your thoughtful consideration of my comments. I look forward to hearing what the ASMFC is going to do to help striped bass make a come back!

Sincerely,
Galen Donovan.

Comments

From: Andy Sparks <asparks1@maine.rr.com>
Sent: Wednesday, March 10, 2021 9:57 AM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello Striped Bass Board,

While I have taken bullet points from others, this is not a "form" email. I feel strongly about these issues and am saddened by the way the fishery has been managed over the years. I recognize that management cannot control all issues related to decline but it can manage based upon those issues out of control such as pollution and habitat loss Below is my position on the current Striped Bass PID.

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient. I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thanks, I hope for a rapid recovery of the striped bass population.

Andy Sparks
Ocean Park, Maine.

Sent from my iPhone

Comments

From: Dr Richard Maurer <drrichardmaurer@gmail.com>
Sent: Wednesday, March 10, 2021 9:57 AM
To: Comments
Subject: [External] Striped Bass PID

TO:

Emilie Franke, Fishery Management Plan Coordinator

I have lived near the coast in Maine for almost 30 years and have striper fished throughout all those years. I have participated in tagging fish in the past and participated in field work for other conservation efforts.

I am certain that well-measured and verifiable reference points for biomass are wildly important to supporting the striper sportfishing economy and resource. Reducing fish mortality and protecting the most reproductively successful fish (larger size) are integral to good regional management.

I hope that regional management policies can strengthen the measurement of biomass reference points, not weaken them over time. This is bigger than striped bass and represents a time where we can support our fisheries as a whole with better and better scientific observations.

Thank you for your consideration.

Best regards,

Richard Maurer
drrichardmaurer@gmail.com
207-939-2967

Comments

From: Matthew Risser <matt.risser@live.com>
Sent: Wednesday, March 31, 2021 9:03 PM
To: Comments; TIM SCHAEFFER; LOREN W.LUSTIG; KRISTOPHER M KUHN; WARREN ELLIOTT
Cc: stripercomments@gmail.com
Subject: [External] Comment on PID for Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

To whom it may concern,
My name is Matt Risser and I have been fishing for striped bass for 14 years from MD to MA. I almost exclusively fish from shore and enjoy costal locations all along the striper's migration path. I am not loyal to any one state or community, but I am loyal to a healthy and abundant striped bass population. I urge you to manage this amazing animal as a single body, and not as pieces that visit each state for a period of time. We must allow fish to leave the Chesapeake to spawn, to not be bonus tagged in NJ, to not be slaughtered in the Cape Cod Canal, and to be respected for the value that they bring as a game fish and not by the pound in boat locker.

I am in full support of any and all conservation measures that restore the striped bass population to the abundance that the current benchmarks are meant to maintain. Even if I must reduce my enjoyment of fishing for a time to increase the chance that my sons have a chance to enjoy the majesty of what strip bass fishing can be.

We live in a world with ever shrinking populations of fish in our oceans. The striped bass was once an amazing success story of management, that has fallen on its face. Please do not allow this fish to go the way of so many others in recent years.

Respectfully submitted,
Matthew Risser
129 Micklitz Rd
Pottstown, PA 19464

Sent from Outlook

Comments

From: ekeyes1 <ekeyes1@cox.net>
Sent: Wednesday, March 31, 2021 8:50 PM
To: Comments
Subject: [External] Stripper Fishing on Cape cod

I have been fishing Brewster flats for 25 years and have witnessed the ups and downs of the striped population. I have been very disappointed with the size of the fish for the last two if not three years. There seems to be an abundance of shorts, but keepers are way off in number for maybe even the last 5 yrs. something should be done!

Thank you!

Edward F. Keyes
Sent from my iPad

Comments

From: Ricardo Ferrer <ricardojferrer@gmail.com>
Sent: Wednesday, March 31, 2021 7:07 PM
To: Comments
Subject: [External] Striped Bass PID

Good afternoon,
I've been a recreational angler for a few years now and have easily noticed a downward trend in the amount of bass and what seems like a loss of a whole size class of fish.

Last year I caught the smallest(under 12")striped bass I've ever seen and on the other side saw fish just shy of the keeper slot size (25-28"avg). Two years ago I could confidently say I caught fish of every size but now it seems there's just two groups. While fishery management in my state(RI) is next to impossible, I believe that the states that get to enjoy this fishery benefit more financially from recreational fishing rather than commercial harvesting for the dinner table.

While the recreational fishing of striped bass accounts for high fish mortality from uneducated fishermen, fowl/gutted hooked fish and the dinner table. The obvious financial motivator of commercial fishing, drives a whole market and a large population to consume the fish without considering the impact it may have on one species and it's broad ecosystem

I believe that our costal waters provide great amounts of other varieties of fish that have been ignorantly deemed "trash fish", they make for fantastic forage and great dishes that can be served in all kinds of restaurants and at home.

As a chef and a lover of all edible things in New England I have not bought any striped bass to serve in my restaurant and continue to educate my staff and hopefully some of my guests on why I don't serve bass and why I'd rather they give these other fish a try.

A reasonable pause on landings of striped bass intended for the dinner table and later on, an educated single slot size and bag limit would be the best way to preserve a species that brings in ancestral, physical, mental and financial stability for us all down the road.

As an equally important side note, managing striped bass and recreational anglers themselves is only a fraction of the bigger picture, we also need to make long purposeful strides in preserving the ecosystem as a whole in order to protect a species. The large scale fishing of menhaden and squid also has a huge impact on the well being and sustainability of striped bass.

Thank you for your time.

Sent from my iPhone

Comments

From: Jeff Deem <jeff.deem2@gmail.com>
Sent: Wednesday, March 31, 2021 6:02 PM
To: Comments
Subject: [External] Striped bass

I can understand why a reduction appears to be necessary based upon the current science and the importance of the striped bass fishery to the mid Atlantic states. However, I do not believe we know how large a population the ecosystem can support. We may be witnessing a population that had risen to what may be unsustainable levels and is now leveling off, as sometimes happens when any stock of anything is rebuilt. I believe we should work into this in steps to avoid any unnecessary hardships that develop trying to maintain an unsustainable stock size.

We have witnessed what level the stock can reach after years of no fishing. Setting the stock targets above a level achieved with no fishing is wishful thinking at best. As with one of the last summer flounder assessments, lowering the targets to a realistic level would mean that we are not overfished and may show that overfishing is not occurring.

Please give this some serious consideration.

As for circle hooks, yes, they should be required wherever they can be used. There is a bid of a learning curve but it is well worth the time.

Respectively,
Jeff Deem
VMRC/FMAC Chair

Comments

From: Edwin Rivera <edmail186@gmail.com>
Sent: Wednesday, March 31, 2021 2:03 PM
To: Comments
Subject: [External] Striped Bass PID

Good afternoon,

Thank you opening the discussion of the state of Striped Bass to anyone who can send an email.

My name is Edwin Rivera, an avid East Coast recreational fisherman out of Westchester County, NY.

I agree with the one fish slot limit for striped bass and the circle hook regulations. I feel these regulations are sufficient in maintaining and allowing the fish population to restock. However, enforcement of these rules and regulations is extremely limited. I feel the biggest deficiency in conservation is enforcement. I have personally seen multiple and small fish being harvested.

The second biggest deficit in conservation is the thousands and thousands of private, charter and party boats taking multiple trips a day. They have different rules than recreational fisherpeople and have the advantage of modern technology which are like eyeballs underwater, almost guaranteeing a catch every single time.

My 2 cents, catch and release only with the circle hook regulations for a minimum of 5 years.

Thank you,

Edwin R. Rivera Jr.

Comments

From: rdenny34 <rdenny34@icloud.com>
Sent: Wednesday, March 31, 2021 2:03 PM
To: Comments
Subject: [External] Striped bass pid

Good afternoon. My name is Randall Denny. I am and avid sportsman and angler and am concerned about the extension and increased quota of the commercial striped bass season. The population has been in great decline and although the new slot limit and circle hook implementation is certainly grear and effective, we should not allow the commercial harvest of stripers at this time. The population needs time to rebound. Thank you for your time

Comments

From: Jason Bartow <lures4bait@aol.com>
Sent: Wednesday, March 31, 2021 1:44 PM
To: Comments
Subject: [External] Striped bass PID

I am a sincere concerned striped bass angler . Fishing over 25 years I have noticed a steady decline in the abundance of striped bass . Fishing logs don't lie . If something isn't done soon as it is almost too late for a full recovery of there stocks . These fish have been Miss managed for years and recreation anglers and catch and release charters are paying the ultimate price ! I think we should be managing the fishery for the abundance and not just for yeild Sincerely Jason Bartow @ lures4bait@aol.com

Sent from my iPhone

Comments

From: Jonathan White <jonwhite@yahoo.com>
Sent: Wednesday, March 31, 2021 12:00 PM
To: Comments
Subject: [External] ASMFC PID comment for Atlantic Striped Bass Amendment 7

ASFMC,
I would like to express my concern on the state of the striped bass fishery and would encourage the move to improve the numbers of striped bass quickly.
That could be extending the slot limit for foreseeable future and part of the year where no harvesting is allowed.
Changes to reduce fish mortality would help the fishery recover, how about a requirement for one treble hook per lure and all hooks to be barbless.

Thank you
Jonathan White
Boxborough, MA

Comments

From: Andrew Braker <andbraker2@gmail.com>
Sent: Wednesday, March 31, 2021 10:59 AM
To: Comments
Cc: Russell Dize; MICHAEL LUISI; David Sikorski; Del. Dana Stein; stripercomments@gmail.com
Subject: [External] Public Comment - Striped Bass Management

ASMFC,

I am writing as a concerned angler/Marylander/sustainable fisheries advocate. Being born in 1994, the first years of my life were spent during the "heyday" of the striped bass fishery. As I've grown older I've developed an intimate connection to the Chesapeake Bay and it's striped bass fishery, but I've also witnessed the fishery collapse in front of my eyes.

There are a number of different ways we need to improve the management of this fishery, but I want to highlight three:

1. Biological Reference Points: I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

2. Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline, currently specified in Amendment 6, should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

3. Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

I look forward to continuing to pursue striped bass, to invigorate our local economies through fishing opportunities, and to continue to share these outdoor experiences with others in an effort to cultivate future anglers and conservationists. Without pragmatic long term striped bass management none of this will be possible.

Thank you for your consideration,
Andrew Braker

Comments

From: daryl.zerveskes@nm.com
Sent: Wednesday, March 31, 2021 10:38 AM
To: Comments
Subject: [External] Striped Bass PID

Striped bass are an important resource for NH. Not only do I personally enjoy fishing for striped bass, they are an accessible fish to teach my son to fish in the ocean. From an economic perspective, I have friends from out of state who come to NH to fish for striped bass and spend money on a license, a rental house or a hotel, meals, coffee and often tackle. In addition, not all members of the party fish so spouses often shop in NH while the other spouse is fishing.

Thanks very much,

Daryl

Daryl F Zerveskes, CLTC
Financial Advisor

91 Morrill Rd, Suite A
Canterbury NH 03224
P: 603-206-6051 F: 603-206-6098
daryl.zerveskes@nm.com
CA LIC 0E88404

"The significant problems we face cannot be solved at the same level of thinking we were at when we created them."
-Albert Einstein

MyTeam:
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Comments

From: bruce bain <brucebain123@hotmail.com>
Sent: Wednesday, March 31, 2021 5:34 AM
To: Comments
Subject: [External] Amendment 7

Didn’t we learn anything since the crash of the eighties! There are so many other plentiful fish that actually taste much better than striper I would really like striped bass to be classified as a game fish only or another moratorium for 10 years till the stocks can be totally rebuilt. This fishery saved my life!

Sent from my iPad. Thank you, Bruce r bain

Comments

From: kristopher magnotti <magtat2@icloud.com>
Sent: Wednesday, March 31, 2021 12:52 AM
To: Comments
Subject: [External] Striper concerns

To whom it may concern,
Hello I am a Long Island resident for the last 20 years and have had the pleasure of spending countless hours on the beaches surfcasting for these majestic fish. As I heard there are possible changes to the protection of the what's left of the ever shrinking biomass, which has been deemed overfished, by your organization I once again feel troubled... I hope you will please take special consideration for the recreational fishing and the ever growing number of anglers, my 5 year son included, that love and cherish the time we spend, not to mention money toward the sport, to target these fish for just that, the sport of it. I'm proud to say I'm a 100% catch and release fisherman, part or a very prestigious surfcasting club, and always spreading fishing and environmental ethics to those I come in contact with. I understand my dream of deeming the striped bass a game fish may be far from a reality but do remember the short term gain $$ on taking more fish out of the water could be far worse over the long term if the fishery again collapses and you lose those who actually do LOVE it.
Thank you for your time and energy in making these difficult decisions.
Kris Magnotti
Bellmore NY

Sent from my iPhone

Comments

From: New England Fishing Academy - Office <office@nefishingacademy.com>
Sent: Tuesday, March 30, 2021 10:43 PM
To: Comments; Dan Mckiernan; Sherry White; Rep. Sarah K. Peake; Michael Armstrong
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Comments

Dear Mr. Daniel McKiernan, Director of the Division of Marine Fisheries and Members of the ASMFC ,

I am writing to comment on the proposal to give Massachusetts commercial striped bass fishermen greater opportunity to land their full of quota of striped bass in 2021, the Massachusetts Division of Marine Fisheries (DMF) is proposing starting the commercial striped bass season a week earlier and increasing the number of open fishing days from two to four.

The proposal comes after commercial striped bass fishermen failed to land their full quota of striped bass in 2019 and again in 202 as you are acutely aware.

Striped Bass are being overfished, from both commercial and recreational fisherman alike and need help. I have always practiced catch and release and have my entire life having kept under 10 striped bass for the table. I am also one of your lottery winners for the Striper Plate and happy to be one of the first 750 people to donate and obtain a Striper Plate. With this information I believe you can gather where I stand on the matter of protecting the striped bass.

I have seen the decline first-hand in my over 30 years of living and fishing in Massachusetts. I am an educator by profession and own and operated a small charter and youth fishing academy business out of Winthrop in the

late spring and summer when school is not in session, so I am on the water more than most and I have seen the drastic change in this fishery and the bluefish fishery in the last 5 to 10 years specifically.

For some context I remember well as a child fisherman fishing from the shore/bridge and public landing in Winthrop all summer. I remember well the pogies being pushed into Crystal Cove and other bays in town and the smell of the fish on hot summer nights. I also remember when it vanished seemingly overnight. I remember the pogy boats coming in and being allowed to vacuum up the bait and whatever else was in the water. This feels exactly like history repeating itself in another form. No one fishes from the shore like they used to in Winthrop and the youth that do fish off the town pier where I dock my boat catch 10- 12-inch fish all summer long. That same spot when I was a child held 20- 30-pound striped bass and bluefish. It was epic and the memories for me are just plain awesome.

I vividly remember around 2002- 2003 catching from my first boat in the anchorage off of Deer Island, upwards of 200 striped bass between three anglers in about 2 hours- Fish after fish, 25- 35 inches. This is not the case today. I am not a marine biologist, but I know what I know, and I see what I see. I see no reason to add to the commercial fishing season, but it makes sense to me to reduce it.

I also want to make it clear that I also place blame on many recreational fishermen and how they also treat caught fish. I have called the environmental police many times over the years, so I do consider myself a steward of the fishery. The sheer volume of large fish that I saw taken all summer off of Winthrop and Revere Beach and out to the BG Buoy was astonishing. I had clients on my boat that were pretty dismayed at what we witnessed as rec and commercial fished the same pods of fish all summer. What I would consider breeder sized fish never came back over the rail to the water- This went on for weeks on end. Snag and drop- happened all

summer by commercial fisherman and recreational fisherman alike in the large pogy schools in the North Channel in the harbor.

Please consider taking the appropriate action to protect striped bass. They DO NOT need more pressure as it is my opinion it should on the contrary be far less.

Sincerely,

Craig

Captain Craig F McLaughlin

85 Monsen Road

Concord, Ma. 02138

617 828 9058

o/o Boston Fishing Company and NE Fishing Academy

Ma For Hire Permit Holder

USCG Licensed and Insured OUPV Captain

Comments

From: Aaron Mariano <analystaaron@gmail.com>
Sent: Tuesday, March 30, 2021 10:25 PM
To: Comments
Subject: [External] Save the Striped Bass!!

To whom it may concern,

For many years the coveted striped bass has been over fished and continues to be overfished in recent years. This was clearly determined in 2019 and although a new slot regulation was implemented, it is still not enough. Consistency in slot limit needs to occur throughout the coast, and commercial fishing specifically through gill netting needs to stop! The current plan to rebuild the fishery within the 10-year timeframe planned by the commission is not going to cut it. At this pace my kids are never going to experience the thrill of catching one of these beasts like many generations of the pas have had the opportunity to do. Please do more to protect the striped bass! Thank you.

Aaron Mariano

Comments

From: liam brouillette <liambrouillette18@gmail.com>
Sent: Tuesday, March 30, 2021 10:09 PM
To: Comments
Cc: Sen. TODD KAMINSKY; Maureen Davidson; Sherry White; Dan Mckiernan; Michael Armstrong
Subject: [External] Conserving a dwindling resource

Hello,

Thank you all for giving us the opportunity to submit comments expressing our opinion on stripped bass stocks. As an experienced striper angler having targeted them heavily for over a decade, I've noticed one thing the fishing has progressively declined throughout my angling career. I stand by a large majority of recreational anglers who fish from surf, boat, and kayak just like myself who want too see this resource protected the way it should be. I stand in FULL agreement with the American saltwater guides association on all of their proposals for stripped bass management. The spawning stock target must remain 125% of the 1995 level and that is a fair target. Many many fellow fly fisherman and Surfcaster's believe that stripped bass should be protected as a game fish similar to bonefish, permit, or tarpon in Florida. Seeing as we don't have any fish in the north east that are game fish and protected from harvest greed and capitalism could leave our oceans and beaches empty and free of fish in our lifetime. The seriousness of this issue is likely not grasped by anyone who doesn't regularly fish for them. There is no time left to save this fish please allow the ASGA to have an active role in managing the stripped bass population and USE SCIENCE PLEASE. Commercial stripped bass fishing is largely a joke and nearly impossible to break even doing at this point due to the state of the fishery. If politicians continue to bow to commercial fisherman and deplete the fish populations therefore INCREASING the market price making it easier for commercial fisherman to make more money there simply won't be any fish left for future generations.

Thanks,

- Liam Brouillette

Comments

From: G Rod <121e10th@gmail.com>
Sent: Tuesday, March 30, 2021 9:25 PM
To: Comments
Subject: [External] Striped Bass PID

Hi
I'm new to this fishery and I love it when I go, either in MD off Baltimore or on the Sac in CA.
Joining here to learn what I can do to keep the fun going. Need to help this stay sustainable.
Gerry
PS thanks to sponsors.

Comments

From: patrick garland <pmgrlnd@hotmail.com>
Sent: Tuesday, March 30, 2021 9:05 PM
To: Comments
Cc: stripercomments@gmail.com; Jason E. Mcnamee; Sen. Susan Sosnowski; Eric Reid; Nicole Lengyel Costa; KURT BLANCHARD
Subject: [External] Striped Bass Amnendment 7

It is my opinion that conservation equivalency should only be considered if striped bass are neither overfished nor experiencing overfishing. The state of our striped bass fishery is in decline, and not enough is being done to hold people accountable or protect tge species. This is a wake up call, and the status quo will result in diseaster! My personal opinion is that striped bass should be catch and release only, the fishing pressure is just too high, and we need to save this species. Thank you!

Patrick Garland
Pmgrlnd@hotmail.com
East Greenwich, RI

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Comments

From: Rui Coelho <rcoelho@gbtu.org>
Sent: Tuesday, March 30, 2021 8:52 PM
To: Comments
Subject: [External] Striped Bass PID)

Dear Atlantic States Marine Fisheries Commission

We know the Atlantic Striped Bass Fishery has been under significant pressure and has been seriously depleted.

Sometimes we all need to make short term sacrifices to enjoy our passions or avocations long term. Please make a rational and scientifically based decision to bring the stock back.

I already made my decision years ago. If I have kept more than 2 fish in the past 7-8 years, that would be an exaggeration.

Thank You.
Rui Coelho
Belmont MA & New Shoreham RI

Comments

From: Rob Lee <fishrhinofish@gmail.com>
Sent: Tuesday, March 30, 2021 7:29 PM
To: Comments
Subject: [External] Striped Bass PID

Greetings ASMFC,

I am a recreational fisherman that has been fishing for over 50 years since I was a little child with my dad for striped bass. I remember many great memories of our fishery and how it has changed over time. I currently live in Connecticut and fish in NY, CT, RI, and MA waters.

I would like to provide my comments for the record in our quest to save our striped bass as it pertains to the public meetings and proposing actions of Amendment 7.

<u>These are my major points.</u>

I believe that 1995 represents an appropriate reference year and should not be changed.
I strongly favor the development of a more aggressive rebuilding plan for Striped Bass as part of Amendment 7.

I would like to see more aggressive changes to rebuild the fish stock quicker than smaller incremental changes over time.

I would like to see the striped bass managed for abundance rather than harvest.

I believe that the striped bass should be managed on a coastwide basis and not by state. We should abolish Conservation Equivalency as I believe that it will further harm the fishery.

I would like for additional education on the safe catch and release of striped bass for fishermen in hopes of reducing fish mortality.

We should destinate the striped bass as a gamefish similar to the tarpon that would help striped bass conservation.

Thank you for your commitment and time in reviewing all of the public comments that we fishermen have sent.

Kind regards,

Rob L

Comments

From: William Barrett <wdb.lmk@gmail.com>
Sent: Tuesday, March 30, 2021 4:31 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC- thank you for allowing public comment on this important issue. I have been a lifelong fisherman and have seen the decline of the striped bass fishery all along the New England coast over the past 8 years. Can I still find fish? Yes, I need to be honest here. But it much harder and it's plain to see that stocks are in extreme decline. I have no idea why the commercial catch rates are so high and I have ABSOLUTELY no idea why recreational fishermen like myself are able to harvest so many fish. I am not just one of those fisherman who thinks the commercial guys are the problem. I happen to think that allowing us all to keep too many fish is the problem.

We know that strict catch limits work wonders in bringing stocks back. I watched it begin to work in the 1990's and then watched as this was moved away from. Please consider bringing back strict limits that give these fish a chance to reproduce so that this is a resource for all of us...not just the commercial guys or guys like myself that have figured out how to find them (even though that has gotten much, much harder).

I can't see any other way out of this problem. I'm sure you have many constituencies but we need some courageous leadership so that our children can enjoy this resource like we have been able to do. Thank you for hearing my thoughts.

Regards,

Bill Barrett

Comments

From: Justin Cooper <rsqcoop@yahoo.com>
Sent: Tuesday, March 30, 2021 3:56 PM
To: Comments
Subject: [External] Striped Bass PID

Good afternoon,

As both a Maine registered guide and a recreational fisherman I am writing you on behalf of our Striped bass. As being close to the end of the range of the migration I feel that we observe and feel the down turn of the striped bass arguably more than most.

My fishing logs show a decrease in numbers of catch as well as a strong decrease in the size of catch from year to year.

I try my best to promote conservation; catch and release as much as I possibly can. I do not harvest any striped bass on my charters and take the time to educate clients and friends.

I believe strongly that we need to take more substantial action to curb the downturn. We need to look at a zero harvest for several years to guarantee a successful return.

I tangibly see a major difference in number and size of fish with the commercial harvest that occurs just South of me in Massachusetts.

Having allowed an increase of commercial days while ignoring the reason for their inability to meet their quotas from overfishing has been difficult to comprehend.

Additionally I am very concerned with the percentage of release mortality. I believe through direct observation a lot of that is due to lack of basic knowledge and understanding. I believe we need to take an approach more like hunter safety education and provide educational videos that fisherman must watch prior to having their license issued to them every year. We could easily provide short educational videos on proper use of circle hooks, what true circle hooks are, as well as how to properly care for, revive and release their fish.

Thank you for your consideration,
Justin Cooper
32 Powder Mill Dr.
Kennebunk, ME 04043

Comments

From: Teddy Nesius <nesius40@gmail.com>
Sent: Tuesday, March 30, 2021 3:37 PM
To: Comments
Subject: [External] Striped bass 2021 PID

Hello, My name is Ted Nesius. I believe that the striped bass are over fished. I believe that the striped bass fishery has been over fished and declining for a number of years. I believe this to be for a number of reasons. I would like to see striped bass a catch and release only fish. Until further research can be done and the bio mass can rebound. I would also like to see an increased cost for a saltwater fishing license. My hope would be that with an increase in cost, there could be more law enforcement for the new regulations, along with heftier penalties for those who break these laws. Thank you for your time. Ted Nesius

Comments

From: Tim Maloy <tm.maloy@gmail.com>
Sent: Tuesday, March 30, 2021 1:40 PM
To: Comments
Subject: [External] Striped Bass PID

The East Coast striped bass population is overfished and faces considerable human and environmental challenges. To help maintain the population, I'd like to see the following changes made to recreational and for-hire striper fishing:

- Prohibit the use of barbed hooks
- Limit of 2 hooks per lure/bait
- Maximum of 4 hook points per lure/bait

Additionally, I'd like to see the commercial quota reduced to 2021 landings.

Thanks,
Tim

Comments

From: Jack Gonzalez <jack@jshomeautomation.com>
Sent: Tuesday, March 30, 2021 12:50 PM
To: Comments
Subject: [External] Save the stripers!!!!

Hello.

Thank you for allowing comment on the status of the striper fishing conditions. I have been fishing for about 6/7 years now and as I have began to learn about the fish and the fishery that I target along our Atlantic coast I have realized how much it gives back to all of us. Protect the striper species and others is crucial on many fronts. I wish we could make the most extreme push and make stripers catch and release only in the same way tarpon in the south are. It's a great sport fish and with all the talk I have heard about the fishery in the 60's & 70's I want to be able to one day have the same experience of a healthy fishery. This is something I have never seen so take an extreme measure like this would make me entirely happy. That said I understand that there is the commercial side of things and everyone wants to benefit in different ways so comprise like having slots in place is understandable. I will continue to fish catch and release only myself and do what I can to allow the fishery endure.

Thank you again for accepting my comment and hope that together we can all have a positive impact on the fishery and how we all do things moving forward.
--
-- Thank you, Jack Gonzalez Cell: 646-289-2318 Owner

Comments

From: Jonah Thomas <Jonah.Thomas.434768143@p2a.co>
Sent: Tuesday, March 30, 2021 8:34 AM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC Fishery Management Plan Coordinator Emilie Franke,

We want to have more rockfish. More like the number there used to be.

So in the short run we shouldn't kill so many of them. We kill more than the existing plan calls for.

Also let's try to do something about pollution and the other things that make the bay a worse environment for them.

Also try to make it better for the fish they eat.

I don't see what we can do about invasive species that are already present and make it harder for rockfish. Look for ways that could help with that.

Sincerely,
Jonah Thomas

Comments

From: jtomici@optonline.net
Sent: Monday, March 29, 2021 9:37 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC,

I am a surf fisherman from the North Fork of Long Island and would like the ASMFC to consider my comments below when drafting Amendment 7 to the Atlantic Stiped Bass FMP. The comments I feel most strongly about are highlighted in **bold** font (i.e., issues 1, 2, 6, and 10).

1. Fishery Goals and Objectives - ***Remove States ability to implement alternative strategies. With respect to maximizing cost effectiveness of current information gathering, please ensure that the quality and accuracy of collected data is improved and NOT diminished.***
2. Biological Reference Points - ***Maintain current 1995 reference with 125% target, i.e., don't "lower the bar".***
3. Management Triggers – *OK as is.*
4. Stock Rebuilding Targets and Schedule – *Prefer smaller incremental changes over time to gradually rebuild the stock.*
5. Regional Management – *OK as is.*
6. Management Program Equivalency (Conservation Equivalency) - ***Eliminate Conservation Equivalency (CE); ad hoc application of CE alternatives does not support accurate comparison to ASMFC metrics***.
7. Recreational Release Mortality – *Sponsor educational campaigns on safer catch and release tactics, encourage marketing of "striper" plugs with single hooks and/or smaller barbs.*
8. Recreational Accountability – *No comment.*
9. Coastal Commercial Allocation – *No comment.*
10. Any other issues concerning the management of Atlantic striped bass – ***Has anyone considered a way to generate separate striper mortality statistics for surf fisherman vs. private and/or for-hire boats? By categorizing them all as "recreational" I don't think we have a good understanding of the impact. I would expect the boat guys have a bigger impact. When it comes to surfcasting, I believe the old saying that only 10% of the fishermen catch 90% of the fish.***

Regards,
-John Tomici

Comments

From: Ryan Duryea <ryanduryea27@gmail.com>
Sent: Monday, March 29, 2021 8:24 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

As a relatively young angler (20 years old) on the east end of Long Island NY, I have been fishing for striped bass since I could walk and over the past 5 years have been keeping a log of the amount of striped bass, as well as the size of the fish caught by myself as well as dad and brother. From the first year we decided to record our catches in 2016 we recorded plenty of schoolies as well as had one of our best years ever catching big bass. That year we recorded dozens of 20, 30 and some 40 pound bass. Since that year, the number of large bass caught has decreased while our efforts have remained the same. In 2017 we only managed to catch half what we caught for large bass while the number of schoolies remained relatively constant. This has been the pattern over the past years, the number of large bass around has inevitably been decreasing.

The past year we've been seeing a large class of schoolie bass in the 24-27" range. This next year or two, this class of fish will be in the 28-32" slot range. These fish will be taken by anglers who choose to eat bass and ultimately defeat the purpose of the slot limit. This slot limit will mean nothing if we can't even get to have 35+" bass caught anymore. Minimum size should be around 36" to keep a bass, which makes it more difficult for anglers to catch and gives the bass a better chance at spawning. It's a lot harder to catch a 36" bass compared to a 28" bass, which will give more fish the chance to live and spawn.

This past fall along the ocean beaches of the south shore of Long Island, I witnessed gillnetters setting their nets separated by a mile along the beach for as far as the eye could see. This stretch of ocean which in the fall migration path for striped bass is also the same place on the east coast of the United States where gillnetting is still allowed. On the beach in the mornings I would witness the gill netters hauling their nets with hundreds of striped bass, most over the 28-32" slot limit, I watched as 20, 30, 40 and 50 pound fish were thrown overboard dead, only to wash up on the beach a little later. This is a disgrace to the entire striped bass fishing community that gill nets are still allowed here. They are not only destroying the striped bass population but also changing their migrations. Oftentimes, when the gill nets were set, catching a striped bass from shore proved to be a challenge, even for smaller bass. When they weren't set, we were able to catch plenty of schoolie bass, with one out of 15 being a keeper fish.

I strongly encourage catch and release striped bass fishing, and I truly hope something is done to change the current path we are on to save the Striped Bass population. They are the best fish out there to catch.

Ryan Duryea

Comments

From: Austin <austin.w.schofield@gmail.com>
Sent: Monday, March 29, 2021 6:19 PM
To: marine.fish@mass.gov; Patrick Paquette; Douglas M. Amorello; Comments
Subject: [External] Striped Bass PID

Hello,

We need to adjust our stripe bass management policy to focus on abundance of the population as opposed for commercial viability. We need to make the fishery strictly catch and release.

Stripe bass are much more valuable as a recreational fish to the Massachusetts economy then as a commercial fish. Anglers spend money on fishing gear, fuel, boats, and in local communities. Charter captains also bring in tax revenue to the state and help support local tourism. Since they are such an inshore fish they are great for introducing people to the sport of fishing. They are easy for anglers to fish from both shore and boat.

We have brought the species back from total collapse before and we need to do it again before it is too late. We have already ruined the Cod stock lets avoid doing it again with stripe bass.

Treating stripe bass like a trophy fish could be a massive boost to our economy and local ecosystem

Thank you,
Austin Schofield
Cell: (781)-799-8356

Comments

From: Andrew Werkema <saekazir@yahoo.com>
Sent: Monday, March 29, 2021 3:14 PM
To: Comments
Subject: [External] Striped Bass PID

Hello, my name is Andrew Werkema and I am a recreational fisherman who fishes for striped bass in the Hudson River.

Here are my comments regarding striped bass fishing and regulations:

From the comments that took place live during the webinar on March 23 and the previous in-person meetings it seems clear that most anglers would prefer that the Commission **regulate for abundance** rather than regulating for maintenance. This point is emphasized by anglers willing to sacrifice for a moratorium or for less fish caught now in order to preserve the species in the future.

Regardless of why or the method of decline it is clear that the striped bass biomass is not growing. To grow the biomass less fish will need to be caught and less fish will need to be kept. Less fish need to be caught because of the amount of death after release. Less fish will need to be kept because those fish can be the subsequent years breeding stock.

If these two points are true, that we need less fish caught and less fish kept, then the regulations will need to reflect those targets.

Option 1: A moratorium. This option has worked in the past. No fishing allowed should greatly increase the survivability of the current biomass. I theorize that the moratorium could be one year on, one year off arrangement. Has this every been tried before? Regardless of the duration it should be considered that anglers who participated in your survey, webinars, etc recommended a moratorium.

Option 2: A pay tag license structure. A pay tag license is used to successfully restrict and control deer populations. I believe a three fish or five fish tag system per angler should be considered if a moratorium is not used. The pay tag license should restrict how many fish are caught and kept. Once the anglers tags are filled then fishing is not authorized, even catch and release. The funds gathered could be used to provide more resources to conserve the species.

Either of the options would hopefully be regulating for abundance.

There were a few comments requesting additional enforcement. I am in agreement with those voices. I only fish for striped bass from shore along the Hudson River in the Beacon / Newburgh area. I have never seen any enforcement in the areas I fish. I have witnessed anglers keeping both small ones and more the allotted amount. Additional regulations to preserve a species will not have any effect without the addition of enforcement. Please increase enforcement and increase the penalties for failure to follow the rules.

Please remove the conservational easement. Numerous voices are calling for its removal. If the conservational easements have been in place for the last ten years of decline of the species then those policies are not working. Even if the easements are not a significant cause of the decline the Commission should still consider removing them. Increasing the steps to preserve the species is what the public wants to see from the Commission. Ten years of easements have not worked, perhaps ten years of no easements may yield better results.

Thank you for your time.

Aj
saekazir@yahoo.com
845-913-5912

Comments

From: Tom Moriarty <tmoriarty514@gmail.com>
Sent: Monday, March 29, 2021 11:12 AM
To: Comments
Subject: [External] Striped Bass PID

Hello,

Please find my feedback below on the PID:

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient to recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7. I also believe that a practical approach to management of the stock is required to speed up the rebound of the fishery. This should include an emphasis on size and bag limits that specifically seek to protect the 2011 and 2015 year classes. If you review the historical data, it seems that it was really 3 exceptional year classes that helped rebound the fishery from the moratorium in the 80s. If we can build slot limits designed around protecting the specific 2011 and 2015 year classes, we could see these groups of fish contribute to other exceptional year classes and help to rebound our fishery sooner rather than later.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we

recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery. **This should include an emphasis on size and bag limits that specifically seek to protect the 2011 and 2015 year classes. If you review the historical data, it seems that it was really 3 exceptional year classes that helped rebound the fishery from the moratorium in the 80s. If we can build slot limits designed around protecting the specific 2011 and 2015 year classes, we could see these groups of fish contribute to other exceptional year classes and help to rebound our fishery sooner rather than later.**

Comments

From: Steve Petruska <stevepetruska@hotmail.com>
Sent: Monday, March 29, 2021 8:48 AM
To: Comments
Cc: michael_armstrong@state.ma.us; Dan Mckiernan; sarahpeake@gmail.com; Sherry White
Subject: [External] Striped Bass Rules

I'm a recreational fisherman, not a scientist so I won't try to influence you with data. I love fly fishing for striped bass (catch & release). I fish from shore or from a kayak and have been alarmed by the decline in the number of big fish. I fish regularly and only managed one keeper bass in 2020. There were a good number of 24" - 25" fish, and many smaller fish. I think poor resource management is the reason for this.

It makes no sense to me to allow any commercial fishing or recreational harvesting of any 28" + fish when the stock of breeding fish is declining. You need to increase the number of breeding fish not remove them. It's a simple equation. More breeding fish equals more fry equals more fish, etc. The reverse is also true.

Guides and others who spend a significant amount of time on the water have been trying to get ASMFC to change the regulations for the past few years, but your organization seems to be influenced more by commercial interests which only represents a small portion of the fishing community. For instance, MA commercial anglers have failed to reach their quota the past two years despite an extended season. Isn't that proof that the larger fish just aren't there? Recreational fishing brings far more revenue to our region. It seems to me that many of the so called "commercial" fisherman are individuals paying for their boats by having a commercial license for striped bass.

Other than a complete moratorium, I suggest the following to protect the breeding stock:

1. Suspend commercial fishing for striped bass
2. Allow recreational anglers one fish in the 24" - 28" slot
3. Continue the circle hook requirement with ENFORCEMENT
4. Modify lures to eliminate treble hooks or at a minimum require that the hooks be barbless
5. Increase the penalties for violations (this needs to be more than a slap on the wrist)

I feel that the first two are critical to restoring the stock. The second two will help reduce mortality.

Thank you for the opportunity to comment.

Regards,

Steve Petruska

Comments

From: Emilie Franke
Sent: Monday, March 29, 2021 8:31 AM
To: Comments
Subject: FW: [EXTERNAL] : Half-heart, half-gut, half-brained perhaps... but compelled to share my thoughts nonetheless

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: Lengyel, Nicole (DEM) [mailto:nicole.lengyel@dem.ri.gov]
Sent: Monday, March 29, 2021 7:08 AM
To: Emilie Franke <EFranke@asmfc.org>
Subject: Fwd: [EXTERNAL] : Half-heart, half-gut, half-brained perhaps... but compelled to share my thoughts nonetheless

Hi Emilie,

Please see the below comments.
Thanks.

Nicole

Nicole Lengyel Costa
Principal Biologist
RIDEM Marine Fisheries
3 Ft. Wetherill Rd.
Jamestown, RI 02835
Office: (401) 423-1940
nicole.lengyel@dem.ri.gov

From: Mark Kane <markkane37@gmail.com>
Sent: Friday, March 26, 2021 9:33:02 PM
To: Lengyel, Nicole (DEM) <nicole.lengyel@dem.ri.gov>
Cc: stripercomments@gmail.com <stripercomments@gmail.com>
Subject: [EXTERNAL] : Half-heart, half-gut, half-brained perhaps... but compelled to share my thoughts nonetheless

Greetings Nicole,

I hope you will read this letter which I was compelled to write, my self-reflective state if you will. Half-heart, half-gut, half-brained to some perhaps, but nonetheless I wanted to share my personal opinion on the Striper fishery.

By way of background, I grew up in fishing in Western Canada, think the infamous salmon runs of twenty years ago which have long disappeared resonate for this stream of conscience, pun intended. I migrated south many moons ago to fish the waters in Southern Rhode Island primarily.

Issue #2

I believe it is safe to suggest that the science of counting fish has probable error. Despite the probable error distribution, I would suggest that you/ASMFC adopt one of the rules that most endowments and foundations utilize, a "smoothing policy". A smoothing policy finances risk in such a way that the financial impact of incurred losses are distributed between members of the risk pool over more than one reporting period. These are also known as chronological stabilization plans. The idea is that by smoothing your spending, in this case the harvesting of Stripers, over a rolling period of returns (breeding classes), you smooth the effect of harvesting to be consistent and sustainable. A simple, yet powerful concept to impact long-term success and sustainability.

I recognize that the current policy has multiple states, multiple spawning areas, multiple spawning classes, and multiple constituents which is not easy to navigate; I am not enviable of the task. That said, I believe you should remove issue #2 because in terms of the science, unless you adopt a consistent policy to define how you will accommodate years where breeding performance is undermined, the stock by definition is unsustainable.

My best regards,
-Mark Kane

Bio: Dad of three future stewards of the environment, concerned fisherman, conservationist, Board of Shelter Harbor Conservation Society, Chair of the American Heart Association in Boston.

Comments

From: Joshua Cooper <jcooper0027@gmail.com>
Sent: Monday, March 29, 2021 7:42 AM
To: Comments
Subject: [External] Striped Bass PID

Ms. Franke,

I would like to submit the following comment regarding thePID.

I love to fish recreationally and striped bass is my favorite target fish. Some of my fondest memories are fishing with my Dad and uncles. They still tell stories of how badly the fisher was managed in their youth and the striped bass moratorium of the 70s and 80s. I do not want this to happen again and it seems the consensus is that the stock is on the decline. I ask the ASMFC to do whatever it can to bring the fishery back strong and stable for years to come. The Commission's objective should be to grow and maintain the stock. The metrics for what a sustainable striper population should not be lowered. Over commercial fishing is a real problem that needs to be regulated with a long term objective in mind. Since these are migratory fish we need a unified system. State by state regulations will not work. I ask that the ASMFC work to keep the fish I love so much around for decades to come.

Thank you for your consideration

Joshua Cooper

Comments

From: Chris & Margret Arfsten <c.arfsten@verizon.net>
Sent: Sunday, March 28, 2021 12:21 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear ASMFC Commissioners:

Before I respond to the questions proposed in Amendment 7 of the Atlantic Striped Bass fishery Management Plan, I'd like to express some thoughts about the plan and the Atlantic States Marine Fisheries Commission.

Is this action needed at this time considering the COVID 19 pandemic and the absence of data on the results on Amendment VI to the fishery plan?

The proposed plan makes no reference as to how the amendment will improve the state of the striped bass fishery, it only talks about outdated objectives and missing priorities. The Board's guiding theme of creating more stability, flexibility and regulatory consistency does not really represent what the Commissions goals of the fishery are, perpetuating a long-term maintenance program to sustain a broad age structure, and a self-sustaining stock.

I've been following the plight of the striped bass fishery since it was restored back in the mid 1990's. The actions of the ASFMC striped bass board to preserve and protect the striped bass stock over the past 10 years has produced undesirable affects due to inaction on their behalf. In 2011 they were informed that if no action was taken, the fishery would be overfished by 2017, which sadly became true. Amendment VI asked for comments on size limits, the Board ignored the opinion of vast majority that the minimum size limit should be 35 inches. If that size limit would have been adopted, maybe the fishery would be in better place than it is now?

What I think needs to happen is, the ASMFC needs to return to their fundamental function of preserving and protecting not only the striped bass fishery but all of the fish that fall under their regulatory jurisdiction.

My final thoughts on this are; an abundant striped bass fishery and all fisheries for that matter benefit everyone. The commercial and recreational people, the charter boats, the party boats, the tackle makers and the boat builders will all benefit from a robust fishery. The Striped Bass Board and the ASMFC has succumbed to often from pressure to appease the parties involved in the financial aspect of the fishery, they need to return to their basic goal of protecting and preserving the fishery.

Issue 1:
I don't think any change is needed (with the exception of #6), the current Goal and Objectives are needed to adequately protect the long-term health and sustainability of the striped bass. The one objective that needs revision is;
Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures.
Number 6: This objective needs to include a provision that the Management Board will respond promptly with significant action if findings show that action is need to prevent the decline of the striped bass stock.

Issue 2:
The current Spawning Stock Biomass (SSB) created in 1995 should not be changed.
The change or lowering the biological reference points leads to a less robust fishery. The failed responsive actions by the Board over the past decade to protect the fishery using the current SSB as the benchmark to regulate the fishery can only lead to a further decline fishery.

Issue 3: The current management triggers as stated in Amendment 6 should remain the same. I don't believe that the board should use management stability as a justification to relax the regulations on the fishery. The knee jerk reaction stated in the PID is contradicted by the Boards lack of action starting in 2011 when the technical committee told them that the fishery would be overfished by 2017. What is really needed is; more adherence to the current triggers and an increased vigilance on recruitment. In short, I would like to see the stock rebuilt more quickly. the 75% lower abundance index for 3 consecutive years should be improved, I think that greater attention to this indicator would greatly improve striped bass abundance.

Issue 4: No change is needed to the current 10-year rebuilding plan, I would like to see that 10-year plan implemented as soon as possible. Any longer time period would only jeopardize further the current state of the striped bass stock.

Issue 5: This regional management issue should not be considered at this time and removed from Amendment 7. Upon reading the description provided in the Amendment 7 PID, I don't see enough information on how it would work once the regions were set up. I get the impression that it be more of an experiment, more of a learn as you go experience.

Issue 6: The foremost issue with conservation equivalency is accountability If a state is granted an exception to the proposed size and bag limit, measures need to be in place and enforced should the reduction of the take of striped bass is exceeded. Greater scrutiny of the proposals is needed to avoid what happened in Maryland in regards to Addendum VI, where it appears that the 2011-year class was exploited as a result of their conservation equivalency proposal and subsequent approval.

Issue 7: I believe that recreational release mortality is an issue with the fishery. More outreach and education on catch and release techniques should be implemented. It is also worth noting that the data I've seen on this is; about 9% of all striped bass released die as a result of the injuries of being caught, but only about 8% of the striped bass caught by recreational fishermen and women are kept. What we know now is that there's measures in place to regulate the abundance of striped bass, and better implementation of those measures are needed. For example, if a 35-inch minimum size was implemented under Addendum VI reduce removals from the stock.

Issue 8: I think the recreational fishery and its accountability to the preservation of the striped bass fishery is an important to the long-term health of the stock. I believe that a recreational harvest should be established in the management plan that would hold anglers accountable for exceeding the limits stated in the regulations. States that use the coast wide standard set the ASMFC should be held accountable collectively. States that are approved to use conservation equivalency plans need to be held accountable as individuals when anglers exceed Marine Recreational Information Program data that is used to formulate their reasons for formulating a conservation equivalent program.

Issue 9: Since the commercial fishery is regulated by a state specific quota based on poundage, I cannot comment on what or in any changes are needed. I would defer to the technical committee to review all of the information to determine if changes are needed.

Issue 10: Greater habitat protection and restoration of these resources would provide a more robust and abundant striped bass fishery, that will benefit all the interested parties in this fishery and the body that oversees the management of striped bass.

Sincerely,

Comments

From: Dominic DeFlumeri <domdeflumeri@gmail.com>
Sent: Sunday, March 28, 2021 2:50 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] PID Comments

Dear ASMFC staff, commissioners, and board members,

My name is Dominic DeFlumeri, recreational surf caster residing in Long Island NY. I have been fishing the surf for 2 decades and have seen the good, bad, and ugly of our beloved striped bass fishery. At this point in time drastic measures are required to ensure the future of this fishery and the state/local economies that greatly benefit from it.

Thank you for this opportunity to comment on these incredibly important and close to heart issues. I will comment on each issue in accordance with the pid numbering scheme.

Issue 1: Goals and Objectives

The goals and objectives outlined in the PID for amendment seven are sound and should not be changed. The largest issue here is making a solid conservation plan to obtain said goals and objectives. The recreational community including myself are begging for the ASMFC to implement a conservation strategy that ensures a healthy fishery for generations to come. Please lean on conservation as a priority when making decisions on meeting these goals.

Issue 2: Biological Reference Point

Changing the biological reference point is the worst idea in terms of conservation. Lowering the reference point will only ensure further demise of the fishery. The exact opposite of your mission statement.

The moratorium of years past has shown that drastic conservation efforts CAN and WILL restore a healthy abundant population of striped bass. The ASMFC should be managing for **abundance** and 1995 should remain as a reference year and goalpost for stocks of striped bass.

Lowering the biological reference point will only show solid proof of the ASMFCs failure to implement appropriate conservation strategies, rules, and regulations in years past and present.

The angling community as a whole is putting our faith in the ASMFC to do the right thing, even with the incredible mismanagement of the past looming over our shoulders.

Please do not lower the biological reference points.

Please manage for abundance.

Issue 3: Management Triggers

Triggers 1-4 should remain the same and are adequate in my opinion. IF AND ONLY IF they are reacted to appropriately!

In the past the ASMFC has routinely ignored management triggers and instead succumbed to "industry pressure". Please stop doing this and let science and facts be your first and only guide.

Trigger 5 should be revisited by the ASMFC. This trigger should require stronger action not just a "review". Along those lines proper science and observation should be used to determine recruitment failure.

Issue 4: Stock Rebuilding Target and Schedule

The ten year rebuilding timeline is excellent in terms of length and effectiveness. Please consider implementing changes in rules and regulations this year, 2021 . Waiting until stock assessments are completed in 2022 is only prolonging the issues of today and pushing a rebuilding plan even further away to 2023.

I strongly urge the ASMFC to develop and include a strict rebuilding plan for striped bass in amendment 7. We can't keep pushing this off, doing so has lead us to where we are today with a diminished and shrinking fishery that is shadow of it former self.

Issue 5: Regional Management

Regional Management should be removed from amendment 7. The region specific science is not adequate at this time to make informed and responsible regional and stock-specific management decisions. The current striped bass population does not afford us the luxury of doing this either.

Issue 6: Conservation Equivalency

Conservation equivalency is a luxury that we cannot afford with the current state of the striped bass fishery.

Please eliminate Conservation Equivalence from amendment 7. All states managed by the ASMFC should be under one set of rules and regulations.

With our diminished fishery conservation equivalency is only doing more harm and further degrading the striped bass biomass. Many states use conservation equivalency to get around ASMFCs rules and regulations.

The option for states to use a conservation equivalency is greatly jeopardizing the overall coastal effort to restore the striped bass fishery. Myself and many others unconditionally oppose the use of conservation equivalencies.

States which have used conservation equivalency in the past have not succeeded in matching the ASMFCs objectives. Continuing to allow it without any accountability on behalf of individual states is absolutely absurd and an embarrassment to the ASMFC.

Please discontinue the practice of allowing states to use Conservation Equivalencies in lieu of ASMFC regulations in amendment 7.

Issue 7: recreational release mortality

Should certainly be addressed in amendment 7. Offering education to anglers on the safe, ethical treatment of striped bass and proper catch and release technique would go very far in decreasing recreational release mortality.

Issue 8: recreational accountability

This should be addressed separately and not included in amendment 7. Implementing accountability for recreational angling is a hugely complex issue with hugely complex tactics.

Please remove this from amendment 7 and focus on restoring the Atlantic striped bass fishery to 1995 levels.

Issue 9: commercial allocation

Commercial allocation should be revised and reformed using relevant recent studies only.

Commercial allocation in my opinion is only plausible when we have a striped bass fishery that is healthy. Which is not the case at the moment. I personally would love to see all commercial striped bass fishing paused until the striped bass stocks are rebuilt to adequate levels.

Other comments:

Money:

I strongly urge the ASMFC to not succumb to "industry pressure" when making these important decisions. Many of these industrial leaders and game players are only interested in present day money making. They lack the foresight to realize that there financial future is in great jeopardy as the fishery diminishes. Please lean on science and the opinions/comments of the overwhelming majority of anglers (many of whom are recreational and guide/charter captains) when drafting amendment 7.

We need to utilize foresight and realize the decisions of today will greatly affect the industries and commerce sections future successes and longevity.

Millions of dollars are spent each year by recreational and for hire anglers, which strongly fuel local and state economies. Everything from tackle shops to hotels greatly benefit from having a strong healthy striped bass fishery. Gas stations, super markets, bars, convince stores also see huge amounts of money spent by anglers in and after their fishing activities. The northeast as a whole attracts an incredible amount of fishing tourism, whom spend large sums of money up and down the northeastern coast. All of these economic contributions rise on the back of having health stocks of striped bass. A diminishing fishery will crest diminishing local economies.

Size and bag limits:

Please consider implementing a striped bass moratorium for a minimum of 5 years. We know it works. At the absolute least please consider a tagging system, which would allow 3 fish a year to be kept by all recreational anglers. The days of one fish per person per day must end immediately. A Moratorium is the answer to our current situation, and many of my peers are hoping to see it.

The size and bag limits that have been implemented in the past have been successful, until they were loosened up. Unfortunately they were so loose that we have a hugely overfished striped bass population at the moment. After the ASMFC and anglers have successfully restored the striped bass fishery the ASMFC must find a responsible sustainable size and bag limit and stick with it. We as anglers are tired of seeing the ASMFC bend rules and change regulations to satisfy the wallets of certain industry players. The health of the fishery NEEDS to be the utmost priority in establishing future rules and regulations. The ASMFC must not rest until we have a healthy abundant population of striped bass.

Implementing a coast wide MORATORIUM for striped bass must be strongly considered at this time. Please save our beloved stripers!

Poaching:

Poaching is a huge problem today up and down the coast. I understand the difficulty in stopping it through police/authority presence and active patrol. I strongly urge the ASMFC to push for much stricter fines and penalties to any person or business caught poaching.

Any recreational anglers caught poaching any of our game fish species (not just striped bass) need to be fined heavily, gear siezed, and license revoked.

Commercial vessels caught poaching should be hugely fined and stripped of there commercial permits immediately. A second offense should warrant captains licenses immediately suspended.

For hire boat captains and guides (charter and party boats) should also be fined much more heavily and stripped of there charter licenses immediately. Captains of these vessels should be held 100% accountable for any poaching done upon there vessel. Doing so would put a stop to the HUGE amount of poaching that takes place on party boats. A second offense should warrant captains licenses immediately suspended.

These drastic and strict penalties would put a huge pressure on all anglers to do the right thing and cease poaching for fear of major repercussions.

Thank you again for the opportunity to comment on the PID for amendment 7. Please take these comments into consideration when drafting amendment 7. Please consider drastic and strict changes on the side of conservation.

-Dominic DeFlumeri

Comments

From: rdpower22@gmail.com
Sent: Sunday, March 28, 2021 12:59 PM
To: Comments
Subject: [External] Follow up to NY Hearings on Striped Bass

As a Striped Bass fisherman for the past 40 years I have a more than keen interest in anything to do with the restoration of their biomass, their preservation and particularly with the proper management of the species.
While the ASMFC may have good intentions it became apparent during the hearing that the Commissioners are not interested in discharging their obligations for the task to which they were either appointed or elected. For those of us on the call it was particularly painful to learn that they were not prepared to answer any questions directed at them and that the entire meeting was handled by two young ladies who were obviously instructed not to answer any of the questions from the audience
This raises the question 1) Are the commissioners interested in the plight of Striped Bass. 2) If they are interested how do they publicly express their opinions and 3) Are they interested in or knowledgeable enough to consider the whole Ecosystem as it pertains to the future of the Striped Bass Fishery.
There was much genuflecting to so called "interested parties" but we were never told who these parties were or what their interests are.
Clearly the future of the fishery depends on proper and attentive management of the species, the environment and those who fish for the species.
Proper management of Striped Bass can result in a greater abundance of fish, more opportunities for sport fisherman and more opportunity for commercial fisheries. However none of these can be achieved unless the ASMFC acts NOW decisively to curtail the overfishing of Striped Bass, intelligent slot limits and a sharp reduction in the gross overfishing of menhaden , the bass's principal food.
Robert Power

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Comments

From: Henry Freundlich <hdf3091@nyu.edu>
Sent: Saturday, March 27, 2021 4:07 PM
To: Comments
Cc: Emerson Hasbrouck; James Gilmore; Maureen Davidson; Sen. TODD KAMINSKY
Subject: [External] Striped Bass PID

Dear Emilie Franke,

My name is Henry Freundlich. I am a 22 year old graduate student that has grown up fishing the waters of Long Island since as long as I could hold a fishing rod in my hand. My appreciation for the local environment, specifically towards the ocean, developed through fishing and fostered a lifelong passion for the outdoors that has led me to where I am today, pursuing a masters degree at NYU in environmental conservation education. As someone that reaps the joy of feeling a striped bass on the end of my line, as well as being one that has studied and understands the value striped bass provide to our local ecosystems, I am writing out of concern for their future wellbeing. The data itself is pretty clear to understand, that the striped bass stock is in decline and humans, in one way or another, are to blame. Though the empirical evidence is clear, interpretations of this data as well as how to implement this information into effective solutions proves to be the challenging aspect. I wish I could say that after having read the current PID for Amendment 7, that I had clear and complete thoughts and opinions on how regulations should be structured for the future. However, all I can say is that at this time, I find myself caught up in the complexity and sympathetic to those in your position, charged with having to create policy that reflects the best interests of all stakeholders as well as the resource in question; which unfortunately can't speak for itself.

Although my insight into how and what should be done from a regulations perspective is limited, I can offer some insight for the value in promoting awareness and increasing understanding for the critical state that striped bass are currently facing. Fundamentally, the most important tool for enhancing awareness is education. Educating the public, specifically those that are directly connected to striped bass such as recreational sport anglers such as myself, allows for information and knowledge to spread, ultimately shaping behaviors and actions around mindful strategies; such as practicing sustainable harvest, catch and release, safe handling practices, use of circle/barbless hooks when applicable etc. Increasing and enhancing education forces those that are directly involved to think critically about the long term repercussions and can yield emerging attitudes that reflect care and consideration for the future, aspects that lead to and trigger creation and implementation of policy that is both accurately reflective as well as effective. However this begs the question, how do we do this?--how can we enhance and increase education on the health of local fisheries to benefit anglers (both recreational and commercial) as well as the fish themselves.

One avenue for increasing education can be directed toward recreational sport fishing. I can speak from experience that the knowledge between recreational anglers can vary greatly, such that there can be minimal understanding or sometimes even total lack of knowledge regarding certain regulations, policy, and general information pertinent to those that partake in recreational fishing opportunities. This is most attributed to the varied demographic within the recreational sport fishing community; whereas I find myself invested and interested in understanding the need for conservation such that I engage in opportunities such as this, others simply do not possess similar values. While this is not something that can be corrected, it is something that can be anticipated.

In an effort to anticipate misinformation and potential lack of consideration for long term aspects, requiring those that wish to sportfish to be literate in basic fishing practices, safety and conservation could prove

insightful. As it stands right now, each state is tasked with implementing their own system for distributing recreational sport fishing permits, a step that must be fulfilled in order to ensure any subsequent fishing activity is legal. However, the process of obtaining recreational sport fishing permits, at least in the state of NY, requires little more than a credit card number. Thus, my recommendation would be for the state to make the process of obtaining a fishing license more involved, by forcing applicants to complete relevant reading and pass a corresponding questionnaire that ultimately demonstrates their competence of fish conservation and specifically the role their actions will play in this arena. Although it would be expected that this would have minimal impact amongst those that exhibit attitudes that would be classified as "anti-conservation", it would likely increase overall knowledge and enhance the understanding of the dynamic relationship that people have with their marine resources. Therefore, if studies were to emerge that reflected problems with certain species, much like with what we currently see with striped bass, it would be anticipated that increased awareness would yield increased action and willingness to be involved and contribute to solving the problem.

Although this remains to be a complex and daunting task, the underlying importance and far reaching implications of the issues pertaining to managing the striped bass stock have reached a threshold whereby inaction is not an option. Despite the obstacles associated in creating a fair and comprehensive system of management, it is necessary that we take these first steps, such as addressing the opportunity to educate, in order to set a framework to problem solve. I hope that my voice, as well those of my fellow anglers and conservationists, can be heard and addressed in this public input period to ensure a fishery for the future; for my children to be able to engage and become impassioned with the natural world the same way I was.

Thank you for your time.

Regards,
Henry Freundlich

Comments

From: Rich Nardo <rjnardo@gmail.com>
Sent: Saturday, March 27, 2021 11:09 AM
To: Comments
Cc: James Gilmore; Maureen Davidson; Emerson Hasbrouck; Sen. TODD KAMINSKY; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7

Hello all, hope you're off to a good start to your weekend.

I just wanted to submit my thoughts on the proposed Striped Bass Amendment 7. Please see below:

- It seems that initiating a comprehensive amendment process at this point in the Striped Bass fishery recovery process is premature. There hasn't been a genuine conversation regarding a rebuilding plan since Addendum VI. This is despite that addendum's requirement that the stock be rebuilt within 10 years of the declaration of overfishing (which took place almost two years ago).
- After doing some research based on what organizations I trust are recommending, it seems that the biological reference points should continue to use 1995 as the reference year and should be removed from consideration for Amendment 7.
- Management Trigger 5 laid out in Amendment 6 should be revisited with the goal of finding a more appropriate indicator of recruitment failure.
- The current 10-year timeline for rebuilding the atlantic striped bass fishery should be maintained and details for how to reach that target should be laid out clearly as part of Amendment 7.
- The information currently available seems to be lacking to properly inform stock-specific or regional management. This issue should be removed from Amendment 7 until the data is available to address it properly.
- There should be accountability if any state chooses to consider conservation equivalency measures despite the uncertainty that it creates.
- Recreational Release Mortality is something that I am particularly concerned about. As an avid fisherman who cares deeply about the fisheries, it always concerns me that my own release and methods could be sub-optimal. I've only been fishing for about 4 years and I still have a lot to learn and I believe I am not the only one. There should be a great emphasis on outreach and education to inform anglers of safe release best practices.
- The commercial allocation seems out of date. I am following the American Saltwater Guides Association's recommendation that the Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.
- There should be an emphasis on guidance for expanding human dimensions research in the striped bass fishery and a pathway for implementing the results of that research into future management discussions. Further, the Striped Bass Board should support research to better understand the relative contributions of individual striper spawning stocks to the overall coastal population targeted by anglers. This could ultimately be beneficial for informing stock-specific management.
- Finally, gill nets are decimating fisheries beyond even just stripers. I believe the commercial gill net fishery along the south shore LI ocean beaches should be prohibited.

Thank you for your time!

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Rich Nardo
e: rjnardo@gmail.com | p: 516-455-2116
Personal: Facebook | Twitter | Instagram | Linkedin
Professional: NGAGE | Writing Portfolio | A Year In The Sound | NTVLI

Comments

From: Maged Ibrahim <m.ibra.87@gmail.com>
Sent: Saturday, March 27, 2021 8:02 AM
To: Comments
Cc: ERIC HOUGHTALING; Russ Allen; captadam@karenannii.com; HEATHER CORBETT; Joe Cimino; stripercomments@gmail.com; TOM FOTE
Subject: [External] Fwd: Striped Bass Amendment 7 PID Comments

Dear Commissioners,

I am a New Jersey angler that is very concerned about the state of the Striped Bass fishery. I have been fishing from the surf 12 years and invest thousands of dollars per year in fishing tackle, travel, and lodging throughout the northeast in pursuit of striped bass purely for sport. The impact to the local and regional economy would be devastating if the striped bass stocks continue to decline. Fishing for striped bass has declined over the last 10 years and these fish need our help! The 2019 stock assessment shows that the striped bass stock is overfished and overfishing is occurring; yet, there is no plan in place to rebuild the stock. Regulators must understand that we need fish mortality below the established threshold. In addition, the spawning stock biomass must be brought back above the established threshold and to the target immediately. We need to not only end overfishing but also rebuild the spawning stock biomass. I am writing to provide my input and feedback regarding the most pressing issues in the Amendment 7 PID.

Issue 2: Biological Reference Points - I believe that 1995 should be used as the base year. The reason for this is that the population had been fully restored and was no longer in decline. Most importantly, there was a healthy mix of different age fish in the population at that time. Certain organizations would prefer to use years when the population was less abundant, essentially lowering the benchmark for future years, making it easier for them to harvest more fish. This would defeat the goal of restoring an overfished population and would never allow future generations to experience the great fishing that had been experienced in the late 1990s and early 2000s.

Issue 4: Stock Rebuilding and Target Schedule - Two years ago, the striped bass stock had been declared overfished. In Amendment 6 (the document that currently managed striped bass) there is language that states that a 10-year rebuilding process should be acted upon if we get to a point where the species is overfished. Two years have gone by and we still don't have a plan to rebuild the stock. Accountability is the issue here. We need to follow the rules of the amendment and come up with a 10-year rebuilding plan and not waste anymore time.

Issue 6: Conservation Equivalency - New Jersey and Maryland are the two states that not only use this but have abused it historically. MD has gone over their quota a couple of times over the past few years and has not been penalized. Overall, conservation equivalency should not be an option for a fishery that is overfished and states that go over their quota should be responsible for taking a cut in following years. Our state should volunteer to put CE on hold at least until the fishery is back to a sustainable level. At that point we can discuss it, but CE has no place in an overfished fishery.

I appreciate your time and dedication. It is important that we continue to look to science and resist the short-sighted economic benefits of some and focus on the long-term health of the fishery and the economy to help us come up with solutions to restore the fishery. I look forward to our state's meeting on Thursday evening. Have a nice afternoon.

Regards,
Maged Ibrahim

Comments

From: John Lajda <johnlajda@gmail.com>
Sent: Friday, March 26, 2021 9:22 PM
To: Comments
Subject: [External] Striped bass PID

I am a seventeen year old from the north fork of Long Island and have been working as a commercial fisherman and charter boat mate since I was eleven years old. As a result I have witnessed a lot of change in the fishery. I believe that the slot limit on striped bass needs to be removed. This year I experienced boats catching and releasing striped bass that were to large only for them to die right afterwards. In the past boats would go out catch a few big fish then go fish for something else. But due to the slot limit boats spend all day fishing for a fish that's small enough to keep killing double what they would have in the process. I think getting rid of the slot or allowing boats a per boat limit on larger fish would greatly benefit the fishery. Thank you for your time.

Comments

From: Timothy Adkins <timothyadkinsj@gmail.com>
Sent: Friday, March 26, 2021 5:59 PM
To: Comments
Subject: [External] Striped Bass PID

Ms Franke,

I am a lifelong recreational striped bass angler and believe that striped bass need our protection now. Striped bass are important to American history and the lifestyle and traditions Atlantic coast residents. With stocks in decline, it is beyond time that we finally make striped bass a gamefish, putting a complete moratorium or ban on commercial harvest of striped bass. Further since striped bass are migratory, recreational anglers in all states with Striped Bass fisheries should have the same regulations of one fish within a 28-36" slot size limit per angler per day, after a 2 year moratorium on recreational harvest.

If lesser action is taken and commercial interests remain open, commercial harvest must be restricted to hook and line only in any state along the striped bass migration after a two year moratorium effective immediately. If there is no moratorium on commercial harvest, there shall not be on recreational either.

Striped bass will only continue to have an enormous economic impact in Atlantic Coastal states if they survive the enormous pressure put on them since the last moratorium decades ago, increasing in intensity and trending up in recent years. Combined with the decline in other near-shore fisheries in these states (Weakfish and summer flounder especially), they face imminent demise. Heir survival depends on humans to do what is right, which is mandate restrictions on both commercial and recreational harvest.

Sincerely,

Dr. Timothy J Adkins, PhD

Comments

From: Richard S <richard.sterndale@gmail.com>
Sent: Friday, March 26, 2021 2:58 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

As an avid fisherman, the striped bass has been a critical part of some of the fondest memories I've made in my life. Fishing for these impressive animals has allowed for some of the greatest times and memories with my family and friends. I hope to share these same experiences with future friends and families; however, the overfishing of the species has been increasingly evident in recent years. It is a shame to see the number of fish taken from the ocean each summer, notably from the flagrant overfishing by commercial fishermen. Frankly, I am astonished to see proposals arise related to increasing commercial limits, as I've witnessed first hands these vessels take literally hundreds of fish from the ocean in a single day spread amongst only a handful of boats. These fish are sacred to so many of us, and there needs to be greater limitations put on the fish, starting with the commercial overfishing that occurs every week.

Regards,
Richard Sterndale

Comments

From: Ryan Durand <ftw401@gmail.com>
Sent: Friday, March 26, 2021 2:45 PM
To: Comments
Cc: stripercomments@gmail.com; WILLIAM HYATT; Sen. Craig A. Miner; ROBERT LAFRANCE; Rep. Melissa Ziobron; Justin Davis
Subject: [External] Amendment 7

Hello,

I am reaching out to provide my comments and concerns regarding the striped bass's current stock levels.

Here in CT we are lucky enough to have had our beloved fish made a state game fish with the removal of the commercial quota. To top it off the state also did away with the bonus tag program last season which is a breath of fresh air for me as I never agreed with the policy.

Some of the topics and issues I feel need to be addressed:

CT winter "holdover" fishery:

We currently have one of, if not the best winter fisheries for holdover striped bass on the east coast (USA). The issue I see is there's no season end here in the state. This means guys are catching "keeper" size slot fish all winter and while most release their catches all do not. I do not have an issue with people targeting them as I feel the oxygenated water mixed with the lethargic movement has a very high catch and release survival rate. I hardly, if ever see fish floating down the river (Housatonic). The main issue I see with the winter fishery is the breeders being "snagged" or fouled hooked and being kept. Regardless of whether this is considered illegal (and very unsportsmanlike) or not people feel like it is acceptable to keep them as they're within the slot limit. I think CT should have a winter season that is **catch and release only** this way there is no question what can and can't be kept. This will allow breeders a much better chance at making it through to the migratory season and heading towards the CT river to spawn.

Rigged Eels:

I am very pleased with the new regulations that require the use of circle hooks. I am even more pleased to hear that tube and worm will be exempt from that rule. The issue I see is rigged eels were left up to the states to decide how to handle that situation. Rigged eels should be considered a lure and also be exempt from the circle hook rule. Unlike when using live eels and "bowing to the cow" rigged eels can't be left still after the initial hit as the bait then looks unrealistic and is more often spit out. I have done some experimenting with circle hooks for rigged eels and my hook up ratio dropped significantly.

Slot Limit:

I know this is the biggest long shot of all the topics I feel need to be addressed. I think there should be a moratorium for the next five years to allow the species the best chance at recovery.

Sincerely,

Ryan Durand

Comments

From: Stephen Richter <wahooslayer89@comcast.net>
Sent: Friday, March 26, 2021 2:10 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Ms. Franke,

Dear Ms. Franke,

It's time. And you know it. We need to rebuild the stocks ASAP. Not wait. We need to maintain the jobs and we MUST have our grandchildren participate and fish in highly populated waters. How do we do that? Stop decimating ANOTHER SPECIES.

Save the jobs, allow grandchildren and their children to enjoy striped bass fishing.

You can only manage such if you have fish. Don't think it can't happen. Can happen. In regards to saving the stock or depleting it.

Choice is yours.

Respectfully,

Stephen Richter

Sincerely,
Stephen Richter
577 Atsion Road
Shamong, NJ 08088

Comments

From: Michael Brangwynne <mike.brangwynne@gmail.com>
Sent: Friday, March 26, 2021 2:03 PM
To: Comments
Subject: [External] Striped Bass PID

Hello Ms. Franke,

I would like to submit the following comment regarding the above PID.

I am a recreational striped bass fisherman and have been as long as I can remember. It seems like the general consensus is that the stock has been in decline, and that has been consistent with my experience over the last several years. I would like the ASMFC to do whatever it can to stop and reverse this trend. I think the Commission's objective should be to grow the stock to abundance, and I am against any measures that would lower the metrics for what a sustainable striper population would be. I am also not in favor of moving to a state-based regulation system, because I think this will create the risk of some states setting criteria in a way that will cause a further decline in the stock.

I am not against harvesting fish, and I usually harvest a fish or two myself each year, but I want the regulations to be set in a way that causes the population to grow as much as possible, not to sustain or decline. I want to be catching these fish with my grandkids one day God willing, and lots of them.

I think the benefits economic and otherwise of protecting these important sportfish and improving the stock to an abundant level outweigh the benefits of the striper as a meal, whether they are being harvested recreationally or commercially.

Thank you for your consideration of my input.

==========
Mike Brangwynne

Comments

From: Brad Jones <bjones@stlouisparish.org>
Sent: Friday, March 26, 2021 1:08 PM
To: Comments
Subject: [External] Striped Bass Cheasapeake

I would like you to consider my comments of not having any trophy season in the bay. We need to save these large spawning fish. This should apply to all state's especially New Jersey fall run. Also, stop the practice of chumming for a year and see what happens. I see the dead fish all over from the chumming fleet in summer. These two simple steps will turn things around. I love fishing the bay and don't want to loose this fishery.
Brad Jones

Sent from my iPhone

Comments

From: Michael Ludwig <michael.ludwig2@gmail.com>
Sent: Friday, March 26, 2021 12:42 PM
To: Comments
Subject: [External] Striped Bass PID

Hi,

I am writing to express my full opposition to any increase in the harvest quota of striped bass in any capacity. It is my understanding that there is currently a proposal to increase the commercial quota to which I am 100% opposed.

I believe that this species is at a crucial point in history, and it is likely on the brink of a collapse. I also believe that it is our responsibility to leave this species and our entire planet better than we found it for the next generation to do the same.

Thank you for allowing me to express my views, I'm sure the right decisions will be made with the understanding that we all play a role in the long term survival of striped bass.

Sincerely,

Michael Ludwig
42 Winthrop St
Charlestown MA, 02129

617-480-3302

Comments

From: Matthew Haeffner <matt@hefftyfishing.com>
Sent: Friday, March 26, 2021 11:32 AM
To: Comments
Cc: Emerson Hasbrouck; James Gilmore; Sen. TODD KAMINSKY; Maureen Davidson
Subject: [External] ATLANTIC STRIPED BASS P.I.D. 2021

To whom it may concern,

My name is Matt Haeffner; I am a 25 year old angler and small tackle business owner living on Long Island and I'd like to express my opinions on a few concerns I have regarding the Striped Bass fishery- particularly (but not limited to) New York's fishery. I have made it a point to take the necessary steps, even in my own business and personal fishing practices, to do what is necessary to protect these fish for generations to come; personal education, altering my baits with safer hooks for C&R, and educating others whenever possible... now I believe it is nearly time for legislative action surrounding the concerns of striped bass populations and overfishing.

I have been fishing saltwater on Long Island since I was a young boy, learning the basics from my grandfather and great grandfather, who would take me out to fish for schoolie stripers and bluefish. As I got older I began playing around with freshwater while living in Ithaca, NY... having moved back to Long Island in 2018 getting back into my salt roots, I immediately noticed a difference in the shear numbers of striped bass, frequency of catching, and size of fish. It is evident that this fishery has been significantly diminished over the past 10-15 years and I have a few opinions as to why that may be, as well as possible solutions to the problem.

1) Commercial Fishing: Put a moratorium on commercial striped bass fishing. Bottom line. There are so many other species of fish that people enjoy catching and eating, and that are arguably tastier than striped bass. Stripers take longer to grow and develop than other present species in NY waters and there is no sense in continuing to destroy the populations of these fish through commercial fishing. As for the livelihoods of those commercial anglers, they can learn to fish for other species and bring money home & food to the table in the same way without diminshing striped bass any further.

2) It is no secret that poachers can be found all over the globe, but Long Island is (or was) a premiere world class fishery for striped bass and people come from all over the state, and country, to target these beautiful fish; With that, come individuals and groups looking to capitalize and have fun fishing- but it also attracts anglers that are: unaware of regulations pertaining to stripers in our state, anglers who poach and keep whatever they catch, and anglers who are inexperienced in handling these fish... thus leading to higher mortality rates even in the case of catch & release fishing. We need massive increases in education in the angling community now more than ever- especially with the spike in fishing we have all seen since the start of COVID-19. On a final note, too many times I have called about poachers, and had nobody from DEC show up (they have too wide of a jurisdiction & not enough bodies) or else they show up too late.

3) Slot Regulations 28"-35": these regs help nobody if you ask me. This class of fish is arguably the healthiest/most fertile, and while they are seemingly the most abundant- what impact will these slot regulations have on the future of the fishery if we continue to overfish the class of healthiest fish? Nothing good.

4) Pollution: The oceans are more polluted than ever, and there is only so much that can be done at a state level to fix or mend the issue... While I don't believe this is the major contributing factor to the diminishing of the striper fishery, it is certainly something that should not be overlooked. If there were an increase in DEC & DEP presence amongst our waters, we would be able to better enforce pollution and conservation practices. It wouldnt hurt to implement higher fines and penalties for those who litter and pollute our shared outdoor spaces.

I have fished for striped bass all over: from Manhattan to Montauk, North Shore to South Shore- and it has never been more apparent in my eyes that there is a serious need for action to be taken in methods for protecting these fish for future generations.

What I personally propose is either: a moratorium on commercial Striped Bass for 10+ years to re-establish populations, in combination with a plan to reintroduce commercial fishing for the species some time down the road...

AND/OR

A massive influx in hiring and training new DEC officers on a state level, so that the DEC have the ability to really crack down on these regulations that we have (or will be put) in place.

I don't want to see this fishery go away; like many anglers I want my future kids, my friends and family to be able to experience the joy that comes from hooking a big beautiful bass, and watching it swim off safely. There is a primitive feeling of combined adrenaline, anxiety and excitement that comes with catching these fish and I want that passed on for anglers everywhere. If significant legal steps are not taken to greater protect Striped Bass, we will likely lose out on one of the best fisheries in the world and it will be at the fault of nobody but the lawmakers who we trust to create reasonable & logical legislation around our fisheries.

Please take your time and consider all the options to protecting these fish for future generations, and consider all the current detriments that are taking away from the quality of the fishery.

Thank you for your time and consideration.

Best in health,

Matthew Haeffner
Owner/Angler - Heffty Fishing
(516)729-9506

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Matt Haeffner
Heffty Fishing, Owner/Angler
(516)729-9506

Comments

From: LINDA GROMEN <lgromen@aol.com>
Sent: Friday, March 26, 2021 11:30 AM
To: Comments
Subject: [External] Stripped bass

Dear ASMFC

Please make the rebuilding of the population of stripped bass the priority of Amendment 7

thank you,

Linda Gromen

Comments

From: Mike Spinney <mikespinney@comcast.net>
Sent: Friday, March 26, 2021 10:56 AM
To: Comments
Subject: [External] Striped Bass PID

To the Atlantic States Marine Fisheries Commission,

In response to the Commission's call for public input on the PID for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass, I am writing to voice my support for a **ten-year moratorium on the harvest of striped bass**.

Simply put, a harvest moratorium is the only course of action that has proven effective at restoring striped bass to abundance. It is the best chance the Commission has at succeeding with a new ten-year plan under Amendment 7. It will not only allow striped bass to replenish their numbers, but it will ensure that all the populations along the coast emerge from the moratorium with strong age distribution as the Commission has stated is seeks to achieve.

Furthermore, while the moratorium is in effect, the Commission will have time to explore and implement new and more accurate means of gathering data on the fish, measuring the recreational and commercial impact, and establish new biological reference points based on new, more accurate data. Each of the Commission's ten primary issues would either be achieved through a moratorium.

A ten-year harvest moratorium is courageous, bold, and the right thing to do for the future of a robust, abundant striped bass population and for the long-term benefit of the angling public.

In addition to the ten-year harvest, I would like to see the Commission consider a number of other measures that will help to further reduce striped bass mortality and support a successful long-term management strategy for the fish, including:

- **Limit treble hooks** to one per artificial lure and require that barbs on artificial lures be flattened when used for striped bass.
- **Issue a $25 Striped Bass stamp** to fund and support collection of timely, high-confidence MRIP data.
- **Eliminate conservation equivalency** and require consistent rules and enforcement along the entire coast.
- **Reject the "two stock" management approach** to Chesapeake Bay and Ocean fisheries. Nets and hooks do not discriminate between resident and migratory fish, and treating them as if they can be segregated during harvest is illogical.
- **Prohibit the targeting of Striped Bass in traditional spawning areas**, as determined by local authorities. Protecting the fish during the spawn is logical.
- **Ban the commercial gillnet fishery** (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists. Gillnets are indiscriminate killers. Banning gillnets would reduce commercial release mortality, bycatch, and make it easier for authorities to police for industrial-scale poaching operations.
- Include a metric to account for a **more accurate commercial release discard mortality** (including all bycatch and poaching) to ensure accurate commercial impact and accountability.

- **Stronger punishments for poaching** (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).

If the new ten-year management plan, articulated in the forthcoming Amendment 7, is based on a coastwide harvest moratorium, supplemented by these points, striped bass will once again be abundant and flourishing all along their migratory range. Any other approach is likely to see their numbers continue to decline.

Please take the bold, courageous action that is needed.

Thank you,

Mike Spinney
Townsend, Mass.

Comments

From: David Pray <davpra@comcast.net>
Sent: Friday, March 26, 2021 10:46 AM
To: Comments
Subject: [External] Commercial

I think commercial and Charter boats should be regulated better. Cut down on commercial numbers. I know it is jobs. But if they keep it up it won't matter. I follow catch and release and take care to make sure they live the best I can. I don't use bait so they don't swallow the hooks.

Sent from my iPhone

Comments

From: W. Brice Contessa <wbricecontessa@gmail.com>
Sent: Friday, March 26, 2021 12:21 AM
To: Comments
Subject: [External] Comment on Amendment 7

RE: Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

To: ASMFC Atlantic Striped Bass Management Board

Thank you so much for the opportunity to comment on Amendment 7 to the Interstate Fishery Management Plan for Striped Bass. Each issue is addressed individually below.

1. *Goals and Objectives*

This issue should be removed altogether. The goals and objectives are not the dilemma. The Striped Bass Management Board's refusal to comply with said objectives are wherein the problem lies.

2. *Biological Reference Points*

There is no reason why any year other than 1995 should be used as the reference point for management. The biological reference point should remain unchanged, and this issue should be removed from further consideration in Amendment 7. The target should not be lowered due to the board's failure to maintain healthy stock.

3. *Management Triggers*

The current management triggers related to mortality and biomass which are included in Amendment 6 are sufficient for accomplishing the intention of striped bass management. Trigger 5 could require revisitation as it is potentially misleading*.*

4. *Stock Rebuilding Target and Schedule*

We must maintain the 10-year rebuilding timeline that is specified in Amendment 6. Furthermore, we must develop a new rebuilding plan for Atlantic striped bass as a fundamental part of Amendment 7.

5. *Regional Management*

Due to the status of the current striped bass population and the fact that there is no available data to inform stock-specific regional management this issue should be removed from Amendment 7.

6. *Conservation Equivalency*

There is no reasonable argument for conservation equivalency to be considered while the stock is overfished and experiencing overfishing. Conservation equivalency is ambiguous and muddies the management process. States that choose to implement it must be held accountable should their regulations fail to meet conservation objectives*.*

7. Recreational Release Mortality

As we speak Massachusetts DMF is conducting a multiyear study to analyze the impacts of various fishing methods and gear types on post release mortality specifically related to striped bass. This issue is being considered prematurely and we should wait until new data is available to weigh in upon it. In the interim mortality reduction efforts should center around education and outreach in order to promote best practices for safe release.

8. Recreational Accountability

It is basically impossible to address an issue as complex and multi-faceted as recreational accountability in the narrow context of this amendment process. This issue should be removed with the exception of how it pertains to state specific accountability for states that implement conservation equivalency.

9. Commercial Allocation

The allocation criteria is out of date. The board should work with the technical committee to devise new commercial allocations that better reflect the characteristics of the modern striped bass fishery.

10. Other issues

Amendment 7 should include guidance for research expansion and provide a means by which said research can be applied to future management debate. Stock specific management should also be considered, specifically via exploring the contributions of individual spawning stocks to the overall population*.*

Thank you for your consideration in this most critical matter.

Respectfully...

W. Brice Contessa
Edgartown, MA

Comments

From: info
Sent: Thursday, March 25, 2021 6:24 PM
To: Comments
Subject: FW: trophy fish

From: Vincent E. Vetere [mailto:vinny@autoexec.net]
Sent: Tuesday, March 16, 2021 9:44 AM
To: info <info@asmfc.org>
Subject: [External] : trophy fish

Sent from my Verizon, Samsung Galaxy smartphone

As a charter boat owner and captain the new rules regarding striped bass has severely impacted my business. It 2019 my clients were allowed to keep 1 striper over 28 inches.
Most chose to fish for and keep 1 trophy fish greater than 45 inches. There would be days when we return to dock with 6 to 8 trophy fish.
Come 2020 we were allowed none. I think it would be more than fair if we (at least for hire vessels) were allowed to retain 1 trophy fish per trip.
We pay $250 for a charter permit. This used to allow our clients 2 fish per trip. Why do we have to pay for a permit if we get nothing in return. I realize that our permit allows our clients to fish without a fishing license but they are free and very easy to get even on short notice.
Please consider our request to allow 1 trophy fish per charter trip this year.

Thank you
Capt. Vinny Vetere

Sent from my Vaserizon, Samsung Galaxy smartphone

Comments

From: trout21 <john.kaufmann21@gmail.com>
Sent: Thursday, March 25, 2021 4:38 PM
To: Comments
Subject: [External] Striped Bass PID

It is an established fact that striped bass are being overfished. The fishing riches of the past twenty years have been devastated. We have a responsibility to future generations to give them the pleasure we experienced of basically having striped bass everywhere.
I urge that there be a moratorium on the killing of striped bass until the stock rebounds to the level we experience in the late 90's

Sent from Mail for Windows 10

Comments

From: Kevin Lesser <kwlesser@gmail.com>
Sent: Thursday, March 25, 2021 4:21 PM
To: Comments
Subject: [External] Striped Bass PID

Hello, I'm a recreational fisherman who lives in Virginia but fishes in Maryland (Potomac River), Virginia, Maine & North Carolina.

ISSUE 1: Fishery Goals and Objectives:

Provide a management plan that strives, to the extent practical, to maintain coastwide consistency of implemented measures while allowing the States defined flexibility to implement alternative strategies that accomplish the objectives of the FMP.

- **I would like to see this issue removed.**

Foster quality and economically viable recreational, for-hire, and commercial fisheries:

- **I would like to see Striped Bass managed as a game fish and also managed for abundance.**

Establish a fishing mortality target that will result in a net increase in the abundance (pounds) of age 15 and older striped bass in the population, relative to the 2000 estimate.

- **The fish should be managed for abundance, and we should do that through a wide array of age and year classes. The larger female fish are the most productive and need to be protected.**

ISSUE 2: Biological Reference Points

Is the 1995 estimate of female SSB still an appropriate benchmark for determining stock status?

- **Yes, the 1995 SSB estimate is appropriate and should be maintained at all costs.**

Is a 25% buffer appropriate for the SSB target?

- **Yes, the 25% buffer needs to be maintained.**

Should the Board prioritize the development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components?

- **With the current stock status, we need to focus on rebuilding the stock and managing it for abundance.**

What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?

- **I would like to see a wide variety of year classes and a sustainable and abundant amount of large fish over 40". These are the most productive fish and are also the oldest and wisest fish; the future relies on them being successful in the next five years.**

ISSUE 3: Management Triggers & ISSUE 4: Stock Rebuilding Target and Schedule:

- **We need to maintain the current management triggers and also the rebuilding framework. I would like to see the ten-year rebuilding period become a lot more aggressive, such as a five-year rebuilding period.**

What is more important, rebuilding the stock quickly, or mitigating impacts to fisheries?

- **Rebuilding the stock quickly is the most important issue here.**

In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?

- **I prefer significant and drastic changes to the regulations to boost the rebuilding process.**

ISSUE 5: Regional Management

Should separate regional management programs be pursued for the Chesapeake Bay and the ocean region, which includes the Delaware Bay/Hudson River stock complex?

- **No, we need to focus on rebuilding the stock and looking at it as one ocean stock. Once the stock is rebuilt to above the 125% threshold and the science and data are available, we can revisit regional management.**

ISSUE 6 Management Program Equivalency (Conservation Equivalency)

Should CE be part of the Striped Bass FMP?

- **It should not, and I would like to see CE removed until we're above the 125% threshold. I live in Virginia and fish the Potomac River and have been for the last 15 years. I've seen with my own eyes the damage Maryland has done to the fishery and the politics they play when it comes to supporting commercial fishing and wiping out the species. If it were up to Maryland, they would round up the last of the SSB and throw them on a hot dock.**

Should the Board restrict the use of CE based on stock status, data restrictions, differences from neighboring states, and/or any other potential issues?

- **I would like CE removed altogether until we achieve the 125% 1995 levels of the SSB. Yes, states should not have the ability to manage regionally if we're below the threshold.**

ISSUE 7 Recreational Release Mortality

Should management focus on reducing the rate at which fish die after being released alive through additional gear restrictions similar to recent actions regarding the use of circle hooks (e.g., banning gaffing or the use Public Information Document for Atlantic Striped Bass Amendment 7 for Public Comment 19 ISSUE 8: Recreational Accountability of treble hooks)?

- **Yes, but they should also be managing the commercial fishery with these same gear restrictions. I've been listening to the hearings, and the 1% commercial discards is nowhere close to correct. Again, I fish the Potomac River, and I've seen the gillnetters operate in the early spring. I've also caught fish that are damaged beyond repair due to damage from the gill nets.**

Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released?

- **I believe we need to focus on fishing mortality, harvest, and rebuilding the stock. The only time these kinds of efforts would be warranted is in times of extreme water temperature and during spawning.**

What are some ways to improve awareness and stewardship of the resource?

- **Through education, social media, webinars, specific licenses for striped bass fishing. Also, educating the fishing community on the importance of having a wide array of year classes and educating new anglers on what the stock used to be like and where it needs to be. If you started fishing last year, you would have no idea what type of fishery this used to and can be.**

ISSUE 8: Recreational Accountability

Should the Board consider implementing an RHL for recreational striped bass management? How should an RHL overage or underage be addressed? Should stock status be considered when handling an RHL overage or underage? Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?

- **I believe this comes down to a data problem. ASFMC and the board should be looking at better ways for recreational anglers to report their harvest and how many fish were caught and released. With the tools and technology available today, this could be done quickly and be very successful.**

ISSUE 9: Coastal Commercial Quota Allocation

Should this Amendment address commercial allocation or be considered in a future management action?

- **Yes, but I would also like to see Striped Bass managed as a game fish until the stock is recovered.**

Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation?

- **No, that data is way too old. We need to move those reference points to a more appropriate time where accurate information is available. Also, based on the hearings, there were almost no commercial regulations during these times.**

Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation?

- **No, I don't believe in regional management while the stock is overfished and overfishing is occurring. If there is a commercial fishery, which I disagree with - it should be managed coastwide.**

ISSUE 10: Other Issues

"How would you like management of the Atlantic striped bass fishery to look in the future?"

- **I want to see the fishery managed for abundance. I want to see more fish and bigger fish. I also want to see a wide variety of year classes like we used to have in the early 2000s.**

Thank you,

Kevin Lesser

Comments

From: Nick Murray <nickmurray29@gmail.com>
Sent: Thursday, March 25, 2021 2:29 PM
To: Comments
Cc: Maureen Davidson; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear Sirs and Madams

I am a resident of NY State and an avid fisherman. I travel up and the coast of New England and the Mid-Atlantic in pursuit of striped bass. I have spent money in every coastal state from Maine to Virginia directly related to striped bass fishing. I am deeply concerned about the state of the striped bass population and the health of the fishery. I have noticed a decline in the quality of the fishery over the past 10 years and I am concerned about its future. I am the father of two children and I want to make sure there is a fishery to pass on to them as my parents passed on to me. I recall the moratorium in the early nineties and the excitement when I hooked my first striper in the Chesapeake Bay. There was a time I didn't think that was a possibility and I fear that if action is not taken we may be headed there again.

As a concerned citizen, I would like to see several measures taken to ensure a viable fishery into the future. I strongly support the American Saltwater Guides Association recommendations for an amendment 7 to the Striped Bass Interstate Fisheries Management Plan. While there are many thoughtful points to their proposal, and I support them all, the one that stands out to me as being the most important is the formulation of a rebuilding plan. It is my understanding that, even though the striped bass stocks have been declared as overfished,there has been no action towards a rebuilding plan even though that is already part of the requirements of Amendment 6. I urge the board of the AFMC to take action in this regard.

Thank you for taking the time to read my comments.

--
Best

Nick Murray

Comments

From: Bev Landstreet <bevlandstreet@gmail.com>
Sent: Thursday, March 25, 2021 12:45 PM
To: Comments
Subject: [External] Striped Bass

Please vote
I am a recreational fisherman and spend a considerable amount of time fishing for stripers from Rhode Island to the Cape. This is a huge economic resource for the east coast and it is important that we treat it with care and consideration. The risks are HUGE!

On Amendment 7, I have concerns about potential changes to the management plan. Please consider the following and be conservative.

Don't play to the lowest common denominator, by lowerin the standards! The focus should be to reduce fishing mortality.

Let's consider that there are many other predators of striped bass other than man, please give ERP's a chance to work! There is no evidence available that leads to a change.

Please go for regulatory consistency, so your enforcement can be focused and effective. Conservation equivalency should not be a part of stripped bass management.

Finally, it would be a good idea to scientifically determine the regional differences before rushing into a regional management program.

Let's grow this stock, so there is more for everyone!

Bev Landstreet
Fishing enthusiast...

--
Bev Landstreet
615-579-6040

Comments

From: James Nash <nashjc@icloud.com>
Sent: Thursday, March 25, 2021 12:29 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

My name is Jim Nash,
I am a resident of Long Island, NY, a surfcaster and member of the High Hill Striper Club.

I am concerned that we are initiating an amendment process when we established last year in Amendment 7 that the board would take action to end overfishing. I would prefer to see a comprehensive plan to rebuild the stock. Again, the stock is overfished and overfishing is occurring.

1. Goals and objectives should be removed from consideration because they have been established and we have yet to see any action to meet them.

2 1995 is the appropriate biological reference points. The board's failure to maintain the striped bass stocks should equate to moving the proverbial goalposts. Do better.

3 Management Triggers 1-4 relating to fishing mortality and spawning stock biomass from amendment 6 are sufficient.

4. I strongly believe that the 10 year building timeline currently specified in Amendment 6 should be adhered to. And I am strongly in favor of including a rebuilding plan in Amendment 7

5. Regional management should be maintained. The region that stands the most to gain or lose from this insert should be the one to manage it.

6. Conservation Equivalency should only be considered when the Striped Bass is neither overfished and overfishing is not occurring.

7. Recreational Release Mortality Addressing this is in Amendment 7 is premature given the Massachusetts Marine Fisheries is currently running a multi year study to assess the impacts of different fishing methods and gear on the striped bass. Any decisions before this study is completed would be premature.

8. Recreational Accountability is an issue that is too broad and diverse and involves species outside of ASMFC's jurisdiction. It is an issue that should be handled outside of Amendment 7, except for cases where CE is involved.

9. Commercial Allocation- while not in my purview, the landings period for allocations was established 50 years ago. Working with the TC to bring this period in line with the current biomass would be a more accurate way to approach it.

Thank you for you consideration .
Jim Nash
High Hill Striper Club, NY
Sent from my iPhone

Comments

From: Brad Curtin <bcurtin1220@gmail.com>
Sent: Thursday, March 25, 2021 12:03 AM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; ray@capecodfisherman.org; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
Fax: 703.842.074

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for the proposed Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass.

My name is Brad Curtin and I am an avid striped bass angler from Wareham MA, I typically spend between 150-200 days pursuing striped bass a year and as you may imagine this consumes a large portion of my free time as such I find the current state of the striped bass stock to be troubling. I wholeheartedly agree with your assessment of the striped bass stock being over-fished and in need of immediate action to not only stop the over-fishing but also allow for the rebuilding of said stock. The following are the comments in regards to the amendment 7 PID.

Issue 1: Goals and Objectives-
I believe the current goals and objectives of the FMB listed in amendment 6 are still appropriate and in line with the current fishery needs and priorities, therefore it is in my opinion that issue 1 be removed from amendment 7.

Issue 2: Biological Reference Points

I continue to believe that the 1995 reference year is appropriate given the abundance of stock and broad age structure of said stock, therefore it is in my opinion that issue 2 be removed from amendment 7. The fact that current conservation efforts have fail to maintain an abundant enough stock of striped bass should never be reason to lower current target stock levels.

Issue 3: Management triggers

I believe that current management triggers relating to fishing mortality and spawning stock biomass (targets 1-4) included in amendment 6 are adequate for achieving the goals and objectives of the striped bass board and if followed should allow for long term health and stability of the stock. I believe trigger 5 may need to be reevaluated simply because there is some inevitable variation and even slight randomness to yearly recruitment that the proposed recruitment failure metric may not accurately measure. Recruitment failure may be occurring but may not be evident for 3 consecutive years due to variation in yearly recruitment, a potential better data set to evaluate recruitment failure may be 3-5 year rolling averages rather than individual yearly values. I would

also encourage bolder strategies put in place for the chance that recruitment failure is found rather than just "reviewing the cause of said failure".

Issue 4: Stock Rebuilding Target and Schedule

I believe the current 10 year timeline specified in amendment 6 be maintained. I am in favor of significant changes being made as necessary to rebuild the stock as quickly as possible. I also feel more focus should be put into implementing those significant changes as soon as possible rather than recent changes implemented that seem to be more focused on slowing over-fishing and eventually leading to gradual rebuilding of the stock,

Issue 5:Regional Management

Considering both the current status of striped bass coast-wide and the lack of data to inform stock specific/regional management it is in my opinion that this issue be removed from amendment 7.

Issue 6:Management Program Equivalency (Conservation Equivalence) (CE)

I believe CE could be considered once it is determined that striped bass are no longer over-fished and returned to 1995 reference point abundance and should states decide to implement CE they must be held accountable for any failure to meet stated conservation objectives. Currently with regards to striped bass stock status I am strongly opposed to the use of CE as it potentially allows dangerous over-fishing to continue as lax regulations are implemented that are not in alignment with the best interest of the fishery.

Issue 7: Recreational Release Mortality

I believe the best ways to effectively reduce the recreational release mortality rate is via angler outreach and education to promote better practices for safe release by working with local tackle shops, guides, charters, and conservation groups (such as American Saltwater Guides Association, Stripers forever, etc.) along with printed handouts, posters and signs. I also believe new regulations to limit the number of treble hooks on artificial lures to one would greatly reduce injuries to fish thus reducing release mortality rates.

Issue 8: Recreational Accountability

I feel the issue of recreational accountability is such a large and complex endeavor that it is not reasonable to attempt to address it during this amendment process, as such it is in my opinion this issue should be removed from amendment 7.

Issue 9: Coastal Commercial Quota Allocation

I feel the current reference period data is drastically outdated and the striped bass board should work with the technical committee to update commercial quotas to better reflect the current status of the fishery.

Issue 10: Other Issues

I am in favor of the consideration of another moratorium if it is determined that the current conservation and rebuilding plans are not enough to return stocks to abundance. I also would like to see recommendations made by the ASMFC and striped bass board to local environmental protection agencies, department of marine fisheries,and any other local enforcement agencies for increased enforcement of all regulations as well as stronger punishment for poaching including but not limited to increased fines, gear forfeitures, and lifetime bans for all recreational and commercial fishing for repeat and egregious offenders. I also support the increase of

fishing licenses and permits if the money from the increases is used towards conservation, data collection, and enforcement of regulations involved in the fisheries.

Striped bass are the foundation of a great recreational fishing community, as well as a source of livelihood for many coast-wide whether directly tied to the commercial harvesting and sale of striped bass, as guides and charter operators, tackle sales and production, along with the enormous tourism industry based around anglers pursuing striped bass. Ensuring a healthy and abundant stock of these fish is not only critical for all those who rely on this fishery for sport and enjoyment but more importantly those who rely on the income developed either directly or indirectly from the fishery to survive. I feel without immediate action to correct the current issues with the striped bass stocks irreversible damage will be done and I cannot imagine the ripple effect that would be caused by this fishery failing. I truly wish you the best in the development of this amendment and hope for the best possible outcome from it's creation not only for my own enjoyment of the fishery and the enjoyment of future generations of anglers but as well as the great potential economic impact the fishery has on this and future generations.

Thank you again for your time and consideration of my comments.
Sincerely,

Brad Curtin

Comments

From: Charles Polley <cjpolley@hotmail.com>
Sent: Monday, April 05, 2021 10:56 PM
To: Comments
Subject: [External] Save the Striped Bass Fishery

To whom it may concern,
I am deeply concerned about the future of the striped bass as the population continues to decline. I am an avid fisherman from the surf and boat- both private and party boat. I have been a catch and release striped bass fisherman for the last approximately seven years as the number of fish I caught has significantly decreased over that time. I hope to preserve the fishery for my children and grandchildren. I support doing whatever it takes so they may enjoy striped bass fishing as much as I do. I also work as a deckhand on a charter boat. I have seen first-hand the number of fish caught decrease each season.

I support catch and release only for recreational anglers and no commercial harvest. Since that is unlikely, I urge you to make drastic changes to the recreational and commercial harvest of these beautiful fish for the 2021 season in order to reach a sustainable population. Consider the following actions:
1. Prohibit gill netting for the commercial catch.
2. A larger slot size of 35-40 inches
3. Continue the use of circle hooks when using natural baits.
4. Lures should have no more than 3 hooks thus allowing the use of one treble hook on a lure.

The time to act is now. Please do not wait another season. The 2021 season could decimate these treasured fish.
Sincerely,
Charles J Polley, Patchogue NY

Comments

From: Mark Portanova <markportanova@gmail.com>
Sent: Monday, April 05, 2021 9:22 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7

I'd like to take a moment to express my concerns with the current state of the striped bass fishery and the proposed Amendment 7. First I'd like to thank you for trying to protect the fish we all love. Your goals to keep this fishery alive and bring it back to a sustainable level should be the goal of all of us. Rather than break down each section of the Amendment I'd like to just give my opinion and view on the situation. We need to use science, experience, and common sense to get a better understanding of what happened and create solutions to bring back this fishery. That being said all the rules and regulations don't matter if they are not enforced. I don't mind even stricter regulations if they will help. Ideas like making it catch and release during times of the year the fish are spawning, extremely hot times of the year or on charter boats, I welcome. I think that until dramatic changes have been seen and recorded we need to keep researching ways to improve the health of these fish.
Thanks
Mark Portanova

Comments

From: John Bleck <johnbleck@gmail.com>
Sent: Monday, April 05, 2021 8:49 PM
To: Comments
Subject: [External] Striped bass PID

To whom it may concern,

I am a recreational angler from Long Island who has been fishing from shore and boat for 30 years. When I look just in my little bubble of the 2 local inlets that I fish the most close to me I've seen the reduction in the population especially over the last decade. This fishery should be healthy and not just small fish and a few large biomass of bigger fish it just its smoke and mirrors to the real issue of over fishing. We all love this fish and need to meet a common ground to get them back to a thriving the way we know this population should be. Thanks in advance for giving a listen and hopefully changes can be made to help.

Sincerely,

John Bleck
Recreational surf/boat guy
Oceanside NY

Sent from my iPhone

Comments

From: Kieran McGlynn <kiermcgl@gmail.com>
Sent: Monday, April 05, 2021 6:10 PM
To: Comments
Cc: stripercomments@gmail.com; Jason E. Mcnamee; KURT BLANCHARD; Sen. Susan Sosnowski; DAVID BORDEN; Nicole Lengyel Costa; Eric Reid
Subject: [External] Striped Bass PID

Dear ASMFC Board Members:

First, I thank you for your service to this just cause. I understand that with competing interests, there is nothing easy about your task. With that said, it remains a most important task, and we, the Public, are relying on you to make the right decisions in our name. In my opinion, the right decision is protecting our weak Striped Bass population.

We seem to live in an age where truth is considered subjective, however I'm not sure that many can rationally dispute the fact that the Atlantic Striped Bass population has greatly diminished from years past and any gains we might be making are dependent upon the choices we make today and in the future. I humbly ask the following of you:

1. Do not lower the Atlantic Striped Bass threshold.
2. Continue to use 1995 Atlantic Striped Bass stock biological reference point.
3. Develop a plan for rebuilding the Atlantic Striped Bass stock in Amendment 7 based upon the 10 year time-frame identified in Amendment 6.

The bottom line is together we need to do what is necessary to replenish the fishery ASAP. The truth is I want my children and their children to be able to enjoy fishing for stripers and at this rate it won't happen. Something has to change and all of us are relying on you to make that happen.

Respectfully yours,

Kieran McGlynn
Wakefield, RI
kiermcgl@gmail.com

Comments

From: Joe Sypek <jpsypek1@verizon.net>
Sent: Monday, April 05, 2021 4:44 PM
To: Comments
Subject: [External] Re: Striped Bass PID

To Whom It May concern:

I hope this finds you doing well and thank you for the opportunity to voice my opinion.
I have been a recreational salt water fisherman for over 40 years. I reside in Massachusetts and have fished the north and south shore of the state as well as Cape Cod and Narragansett Bay and primarily surf cast.

The primary goal of this letter is to address Amendment 7, which is to create a ten-year plan to restore striped bass to abundance and achieve strong age distribution for the stocks.

My recommendation to the ASMFC is simple and straightforward: Implement a ten-year harvest moratorium.

- **A moratorium (in both coastal and estuarian areas with no recreational or commercial harvest) of 10-years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.**

A harvest moratorium would immediately achieve a maximal reduction in fishing-related mortality by halting commercial fishing activity as well as recreational harvest. Recreational angling would be allowed to continue on a catch-and-release basis.

In addition other ideas to help with the plan that I support would include:

- No targeting of Striped Bass in traditional spawning areas especially those in the Chesapeake Bay, Massachusetts Bay/Cape Cod, Hudson and Delaware River areas.
- Initiate a Striped Bass Stamp Fund to support collection of timely, high-confidence MRIP data from Maine to Florida.
- Ban the commercial gillnet fishery (coastal/estuarine areas); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including by-catch and poaching) to ensure accurate commercial impact and accountability.
- Implement stronger deterrents for poaching (counting black market catch against commercial quota, life-time ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- For anglers limit treble hooks to one per artificial lure.
- For anglers require that barbs on artificial lures be flattened when used for striped bass.
- Countinuing the ASMFC efforts to improve management strategies for Atlantic Menhaden.

- Long term I would ultimately like to see the Striped Bass achieve **Game Fish Status**.

In advance thank you for your time and consideration.

Best regards,

Joseph P. Sypek, PhD.
Recreational Fisherman, Research Scientist,
University of Rhode Island/Virginia Institute of Marine Sciences Alumni

Comments

From: David Ouch <davidouch92@gmail.com>
Sent: Monday, April 05, 2021 4:11 PM
To: Comments
Subject: [External] STRIPED BASS PID

Hello,

I am commenting on the Striped bass PID. I'm an avid angler from MA. Fishing is what I do and it's how I enjoy most of my time. Over the years, the pursuit of Striped bass has enveloped me. It's even driving me to write this email. I want to speak on the state of this fishery. We must do what we can to secure the stock of the Striped Bass and years to come. Not for us to endure now but for our future generations to experience the greatness of these fish. I want to share these encounters with my son as he grows older. I want to share the feeling of excitement, the run of a Striped Bass pulsing through my Rod. To me it's more than a fish. It is my drive and tranquility at the same time. This is why we need to preserve what is left of this stock and nurture it to full health. Because without it we are lost and confused. We must look back and learn from the past. Secure the stock the best we can before it's too late. Support catch and release for this beautiful specimen.

Best Regards,
Dave

Comments

From: Ethan Hutchinson <ethanhutchinson@hotmail.com>
Sent: Monday, April 05, 2021 4:05 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

The primary areas I fish for Striped Bass ("Stripers") are outer Cape Cod and the South shore of Long Island.

I am old enuf and have been fishing long enuf to remember Striper fishing before the last moratorium. Back then they were almost unicorns. To see one or two here or there was amazing. There was only one person I knew that would sneak out overnight to his secret spots and regularly bring in big stripers - so amazing at the time he rightly earned the nickname, "the bass king".

I remember what it was like just after the moratorium too. There were stripers everywhere. Huge schools of 30-40" fish all over the place. The moratorium worked. It worked really well.

The volumes of Stripers seemed strong for the years thru "one at 36". As the years progressed, every change in the keeper limit resulted in noticeably less stripers the next year. A particular change I noticed every year was in the reduction in the volumes of smaller 20-24" fish that used to congregate in football field size schools in the shallows. Those schools have dwindled down to numbers of fish that are countable with the naked eye as they pass by the boat.

Something is very much not working.

The inevitable outcome is going to be the need for another multiple new class spawn moratorium to save the species again. I believe this will be the only solution to saving the species again within a couple seasons.

If there is need for a continued harvest, I'd propose a return to "one at 36" for recreational anglers, circle hooks only, and single inline hooks on any artificial to reduce release mortality. This - combined with a "bass tag" or "bass license endorsement" system - and much stiffer fines for poaching or fishing w/o a proper license - to raise funds for more enforcement personnel. Maybe this will help to find some balance.

I fear the powers that be have greatly underestimated the numbers of recreationally harvested and otherwise released Stripers that die. They are underestimating the numbers of recreational Striper fisherman with no accountability whatsoever to report harvest.

Some things - like pre spawn fishing of any kind that targets striped bass should be banned immediately and never allowed again. Interrupting and stressing out a large female striped bass on her way to spawn is simply unnecessary. It has almost no social or commercial value except to the vanity of the fisherman.

I'd propose a more aggressive public information campaign. A required notification of the health hazards that come from eating striped bass wherever it is sold or served. This hazard is far underknown by the general public even though it is a much more serious threat to public health than the consumption of many other species that are commonly identified as unhealthy. This may help to deter the keeping of recreational caught fish and the reduction of commercial demand and help to find that balance.

As for commercial demand. I'd propose that a definitive demonstration of a history of striped bass commercial fishing be required for any commercial license to be issued and circle hooks only to minimize the released undersize fish release mortality. Circle hooks and single inline hooks only to help reduce undersized after release death. No trading up and etc are obvious.

At migratory choke points during the season, I'd propose a "sport fish only" window - or at least a more strict limit of one per recreational boat. Perhaps even a "no keep" window to allow the concentrated mass of Stripers to pass by w/o being slaughtered. It hurts me every fall to stand on the beach and see the hundreds of boats just offshore simply wiping out the species.

Thank you for the opportunity to present my thoughts,

Very truly yours,

Capt. Ethan Hutchinson

Comments

From: Matt Lusignan <lusignan@mac.com>
Sent: Monday, April 05, 2021 3:05 PM
To: Comments
Cc: stripercomments@gmail.com; Tommy
Subject: [External] Striped Bass Public Information Document

ASMFC,

Thank you for the opportunity to take public comments related to the the Atlantic States Marine Fisheries Commission review of Amendment 7 to the Interstate Fishery Management Plan.

I would very much like to see a healthier stock of striped bass ideally returning to 1995 numbers in excess of 200 million pounds of Female SSB. I have learned to fish with my son over the past 7-8 years and am very concerned about the decline on striped bass in recent years. This is an amazing sport that should be available for fathers and sons to enjoy for generations.

The primary concern that both my son and I share is around Conservation Equivalency. We are supportive of a change to conservation equivalency - specifically a regulation that would only allow conservation equivalency practices to be permissible when the striped bass stock returns to levels at or above that of the 1995 assessment.

Thank you for everything the ASMFC does to protect this amazing recreational resource on the East Coast.

Matt Lusignan
96 Higfhfield Road
Wilton, CT 06897

Comments

From: Nick Danforth <danforth.nick@gmail.com>
Sent: Monday, April 05, 2021 11:57 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7

Writing to provide public comment on the upcoming Striped Bass management amendment 7.

To briefly summarize, these fish are once again in a perilous position after years of over fishing. Let's not make the same mistakes of the 70s and 80s again and rebuild this stock to 1995 levels so that it can provide enjoyment and economic benefit to generations to come.

Specific thoughts:

Issue 2—Biological Reference Points: 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 4—Stock Rebuilding and Target Schedule: The 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 6 —Conservation Equivalency: CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Other ideas:

Protect the current population of Striped Bass entering the current slot limit (28″) by increasing the slot limit of keeper size bass to begin at 32″, making the slot limit 32-36″. Set boat limits of 2-3 fish per day per vessel (regardless of for-hire status or # of passengers)

Institute a MANDATORY online education program for anglers, to be taken when applying for a saltwater fishing permit targeting conservation , proper equipment use (such as using circle and inline hooks) as well as best practices & techniques for catch and release of Striped Bass and Bluefish.

Prohibit all use of treble hooks when targeting striped bass to reduce catch and release mortality. .

Comments

From: Dan Busch <dnbusch@gmail.com>
Sent: Monday, April 05, 2021 9:30 AM
To: Comments
Subject: [External] Atlantic Striped Bass PID

Please increase regulations on this important species of fish. As an avid Fly Fisherman and seafood consumer I hope we can collectively come together to ensure that this species can begin to thrive. The fishing industries practices are clearly not sustainable and realistically unregulated. Solutions need to be found in regulating industrial fishing practices first and foremost. Sport fishing can also contribute with increased regulations. Thank you for hearing this submission.

Daniel Busch
Local fly fisherman in Orient NY

Comments

From: Ryan Everetts <1991angler@gmail.com>
Sent: Monday, April 05, 2021 3:12 AM
To: Comments
Cc: 2021striperPID@gmail.com; stripercomments@gmail.com; 1991angler@gmail.com
Subject: [External] Striped Bass PID

To whom ever will listen,

Thank you for the opportunity to voice my opinion. I have witnessed the striped bass population drastically decline first hand as a recreational fisherman.

I will keep this straight forward and to the point. The world sadly revolves around money. The striped bass is a critical financial resource to the entire Atlantic seaboard of the United States. If it won't be done for the greater good of the species, as clearly scientific data is astoundingly being ignored, please save the striped bass and allow all businesses up and down the East coast the opportunity to survive on the greatest fish in the world.

I have a 21 month old daughter and another expected in 4 weeks, I am pleading with you the opportunity to share with them the same passion I have of chasing the great American Striped Bass.

I recommend to enforce a strict catch and release ONLY law. Aren't these fish more valuable swimming in the water than in history books? Yes. Yes they are. This is clearly the fastest was to rebuild the population.

Thank you for your time and efforts in saving the striped bass.

Ryan Everetts
Stratford Connecticut

Comments

From: Eastcoast Fishingfanatic <jeffsullivan818181@gmail.com>
Sent: Sunday, April 04, 2021 11:15 PM
To: Comments
Subject: [External] Striped bass conservation

We need to make striped bass illegal for commercial purposes! We are at a 25 year low for these beautiful fish that everyones child should have the pleasure of catching 20 years from now. Let's do something productive in protecting these fish!

Comments

From: Benjamin Roopenian <benjaminroopenian@icloud.com>
Sent: Sunday, April 04, 2021 8:52 PM
To: Comments
Cc: Dan Mckiernan
Subject: [External] Please do not Lower the Goal Posts!

Any steps away from keeping this fishery in pristine condition are in the wrong direction!

Ben Roopenian

Comments

From: randrcharters@aol.com
Sent: Sunday, April 04, 2021 8:24 PM
To: Comments
Subject: [External] Position on Striped Bass

Just my 2 cents

Connecticut should be compatible with its Bordering States of New York and Rhode Island.

A closed season for Striped Bass would be a good thing similar to New York.

Stop targeting of Striped Bass in estuaries and rivers from January through March including catch and release. Create a safe zone for the Striped Bass during this time. . (Its amazing how many people talk about conservation / mortality rates, but there they practice the catch and release of Bass in the rivers, bragging about 100 fish a day released. What about mortality?)

Current slots are fine as they are.

Captain Jim Christensen
Rod and Reel Charters
E Mail RandRCharters.com

Comments

From: James Spica Jr <jamesspica@gmail.com>
Sent: Sunday, April 04, 2021 4:45 PM
To: Comments
Subject: [External] Striped Bass PID

ASMFC Board Members,

I am writing regarding the Striped Bass PID to voice my concerns about the state of the Striped Bass fishery and **recommend strict management measures** to immediately curb (and eventually reverse) the decline in the stock. I am an avid striper angler—I reside in Michigan, but make multiple trips each year to fish for Striped Bass in Massachusetts (and occasionally other Atlantic coast states). I hope that other out-of-state anglers who provide license revenue and tourist dollars feel as strongly as I do about **protecting the Striped Bass fishery**—my writing this comment is a testament to the value of the recreational striper fishery in the Northeast.

As an angler I have witnessed, year by year, **the decline in the quality of the Atlantic Striped Bass fishery**. The **science** on this is clear: overfishing of breeding-class Striped Bass, pressure on stocks of integral forage/prey species such as Menhaden, and water quality in key spawning areas are all contributing to the decline. **The ASMFC should adopt strong, immediate measures addressing all three of these causes based on sound science and ensure the continuation of further study where warranted.**

I have divided this letter into sections based on the questions asked in the Public Comment Questions sections of the numbered Issues in the Public Information Document for Amendment 7 to the Interstate Management Plan for the Striped Bass.

Triggers and Stock Rebuild

The Board must immediately respond to overfishing with significant changes to rebuild the stock quickly. **Smaller incremental changes may not be enough** to reverse the decline in the near future, further imperiling the breeding stock and forage base for the Striped Bass. A majority of the recreational striper fishing community clearly agrees. While such measures may lead to short-term frustration in the commercial fishing sphere, they will benefit as much as recreational anglers in the long term. The reality is that strict, immediate measures are the **best way to put both recreational *and* commercial fisheries back on their feet in the shortest time**.

CE and Regional Management

Since multiple issues facing the Striped Bass population contribute to their decline, the **combination** (and strength) of those issues should proportionally factor into their management. The Board should *only* consider separate regional management programs if certain regions are more essential to bass spawning and food source. In other words, if a particular region is estimated to hold breeding-age fish for longer or face more pressure on forage/prey stocks, then said region should face stricter management measures.

As regional or coast wide estimates are more precise than state-wide ones, it **is important to use the most precise data possible**. Using coast-wide measures would also clearly define this **issue as a coastal issue**, not a state-by-state issue. One state falling out of line with the others would have a seriously adverse effect on bringing back stocks of Striped Bass.

Release Mortality and Quotas

While management should consider reducing catch-and-release mortality, the more important effort is **reducing overall pressure on the bass**. Drastic reduction in commercial quotas and requiring catch and release for recreational anglers are the measures needed to bring the striped bass stocks back to healthy levels. Seasonal

closures may be necessary, depending on the data and environmental conditions observed; and periods of catch-and-release only could be imposed on anglers during certain times of year to allow for unmolested spawning.

While the striped bass faces many threats, the keeping of breeding-age striped bass is an issue entirely under our control and points to a relatively easy solution. In conservation efforts of other game fish, a tried-and-true method is a slot limit to discourage the keeping or killing of breeding-age fish. **The ASMFC should, based on sound scientific data, completely ban the keeping of breeding-age striped bass by commercial and recreational anglers until such time as the stocks have rebuilt.** A slot limit of one sub-breeding-age fish per day could be applied to satisfy recreational anglers; and limited quotas for commercial fishing. Additionally, the coast-wide quota should be explicitly set on an annual basis; and it should follow frequent annual updated stock assessments.

In closing, I would like to say that the recreational fishery for Striped Bass confers significant economic benefits. Strict management measures to rebuild stocks have been **proven success stories on the Atlantic coast for decades**. Examples include the Striped Bass moratorium in the 1980's, and the rebuilding of Red Drum and Fluke populations further south. Make the Northeast Atlantic Striped Bass population the **next success story**!

Thank you for your time and effort,

James P. Spica Jr.
jamesspica@gmail.com
(313) 820-9809

Comments

From: Kevin O'Connor <koc5150@yahoo.com>
Sent: Sunday, April 04, 2021 1:31 PM
To: Comments
Subject: [External] Striped Bass PID

Good afternoon,

I would like to submit my comments on the Striped Bass Amendment 7 Public Information Document. I am a recreational angler based in Upstate New York. I attended the NY public hearing hosted by NYSDEC on March 23. My impression of that hearing is that there were many people who felt the striped bass are over fished and that the fishery is not what it once was. One comment from another angler struck me in particular. He spoke of the need to protect the fishery for future generations and I could not agree more with that sentiment. I think it is imperative to take the necessary steps to improve and preserve the striped bass fishery. We have an obligation to take the steps to increase the striped bass population to make it better in the near term and especially so those who follow have the same or better opportunities. The joy of fishing and being outdoors is such a privelege and should be preserved. It was clear from the hearing that a moratorium has worked in the past and I would support that or any other steps to manage striped bass to abundance.

With regard to the specific items for comment. I agree with and support the commments provided by the Saltwater Guides Association.

Thank you for allowing public participation.

Thanks,

Kevin O'Connor

Comments

From: Bruce Gallaway <brucegallaway@gmail.com>
Sent: Sunday, April 04, 2021 10:54 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 - citizen feedback

Dear ASMFC,

As a new resident of Massachusetts and passionate recreational striped bass angler, I want to express my thoughts as a citizen who cares deeply about your actions that can either positively or negatively affect the future of striped bass. Together with other anglers, I have broken down my thoughts on amendment 7 below and I hope that you give due consideration to the millions of anglers who feel similarly, but whose voices are not often heard by your team.

Regarding the Striped Bass fishery and the conservation and preservation of it:
1-First and foremost strive to increase and re-build the existing and future spawning stock along the Mid-atlantic and New England coast until scientific studies can prove that striped bass are neither overfished nor are we experiencing overfishing.

2- ASMFC must respect the triggers put forth in Amendment VI through language that will hold ASMFC accountable if protection triggers are ignored as they have been done since Amendment VI

3-Protect the current population of Striped Bass entering the current slot limit (28″) by increasing the slot limit of keeper size bass to begin at 32″, making the slot limit 32-36″.

4-Institute a MANDATORY online education program for anglers, to be taken when applying for a saltwater fishing permit targeting conservation , proper equipment use (such as using circle and inline hooks) as well as best practices & techniques for catch and release of Striped Bass and Bluefish.

5-Encourage tackle manufacturers to move away from using treble hooks and to switch to inline single hooks.

Sincerely,

R Bruce Gallway Jr,

West Yarmouth, MA

Comments

From: Henry, Ryan <henryr6@go.stockton.edu>
Sent: Sunday, April 04, 2021 10:12 AM
To: Comments
Subject: [External] Striped bass PID

Hello,

I am writing this email to express my concern over the state of the overfished Striped Bass. These fish need to be Designated as a gamefish and all commercial fishing needs to stoped.

If we keep taking out all the large striped bass the gene pool for those fish will be wiped out and there will be no large striped bass for future generations.

In my opinion the striped bass should be catch and release only for the next 5 years, and more funding needs to be dumped into helping the Chesapeake Bay which in return will help the Spawning stock biomass.

The answer is clear on what to do, but we need to act now before it's too late.

Regards,
Ryan

Comments

From: Edward Purcell <tedgpurcell@gmail.com>
Sent: Saturday, April 03, 2021 8:38 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane
Subject: [External] Subject line: Striped Bass PID

To whom it may concern:
Please accept my thoughts and comments with regards to Amendment 7 for the management of striped bass. I apologize if this wording is incorrect, but recent data from NOAA Fisheries have stated that striped bass are overfished and the population is not "healthy" as was the aim of Amendment 6.

I have stated previously in communications to Director McKiernan that striped bass fishing needs to be stopped for a period of time so the stocks may recover and to formulate a better management plan. Some may argue, "we are not there yet", but I would counter with, ``why wait for a near complete crash of the species as we saw in the late 1970s and early 1980s?"

The time is now to shut down all harvest of striped bass, study the impact of both recreational and commercial harvest and formulate a new plan as the existing plan has not worked. This fishery and its economic value are too great to lose. Commercial fishing should be eliminated or "re-invented" to not deplete mature breeding fish and recreational fishing needs to be better studied and better managed so that the pursuit of and occasional keeping of a striped bass is done in a way to allow the species to prosper.

Sincerely,
Edward G. Purcell
15 Sassawanna Road
Rutland Ma 01543

Comments

From: fishnewport@yahoo.com
Sent: Saturday, April 03, 2021 8:08 PM
To: Comments
Subject: [External] Striped bass regulation

I understand the importance of managing the striped bass migration. I release almost everything i catch. I also fully agree with using circle hooks. I have used circle hooks exclusively for years. I am not a fan of the slot system. But mostly, i dont agree with how the system works! I may be wrong on some points, if so, i apologize. But we used to be at two fish over 28". Then, they changed it to one fish at 28". Which was my understanding at the time it was for one year and would revert back? Which did not happen! Now we are at the slot regulation, which again, will never change. All i hear is, these changes were made, and then kept, because, "WE asked people, and everyone said it should remain." Who did you ask? Your personal friends? Because i dont know a single person i know was ever asked their opinion, or had an opportunity to vote? Where does this end? Most people i spoke with, thought making it two fish, or even one fish at 32" made more sense. I personally was fine at 36". These regulations get worse and worse, and we are told its for one year! Then you people never lift them! So, it appears all your doing is not working? One year they claim the sticks are down, and then the next thing they say, it was wrong, they were not overfished! I dont see why its all on the recreational fisherman either? Commercial regulations have stayed the same it appears? I dont know why there is a questionnaire on the application when we all get our fishing license every year? Its seems like the decisions are being made one sided all the time from an over conservative group! I think if we are told, there is a new regulation, there should be a time period put on it. One year, three years, whatever, but stick to it! Sorry i got so long winded, but never had an opportunity to voice my opinion over the last 20 years, and i git carried away with my venting. Maybe some real penalties to these poachers is what will make a difference? Because what you do now is a joke, and not a deterrent at all.

Sent from Yahoo Mail on Android

Comments

From: Jake Stevens <jacobhstevens@gmail.com>
Sent: Saturday, April 03, 2021 2:16 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom it May Concern,

My name is Jake Stevens. I'm a resident of Falmouth, Maine. I'm writing to submit my input on the initiation of Amendment 7 to the Atlantic Striped Bass Fishery Management Plan.

I believe the Plan should be focused on the recovery and stability of the stock and rather than allowing commercial harvesting of the species.

The striped bass spawning grounds should be protected and managed differently than the coastal fisheries. A band on any harvest (commercial or recreational) for a limited time period would go a long way toward reaching the ASMFC's 10-year stock rebuilding goal. Furthermore, banning the gillnet harvest and limiting the number of treble hooks per lure would help achieve this.

We need harsher penalties for poaching and violating catch limits.

Additionally, we should take a lesson from the Duck Stamp Act and require a Striped Bass stamp which could help pay for conservation and the collection of MRIP data.

The best way to ensure the long life of the striped bass fishery is to ban commercial harvest and treat it strictly as a game fish.

Thank you for your time,
Jake Stevens

Comments

From: Casper Crouse <ccrouseiv@gmail.com>
Sent: Saturday, April 03, 2021 11:58 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hi Emilie,

My name is Casper and I have fished for striped bass since 2012. I lived in Southeast Massachusetts at the time I started surfcasting and have fished up and down the coast since then. That includes Maine, the state of New Hampshire where I grew up, Massachusetts, Rhode Island and Connecticut. Just as the striped bass migrates up and down the coast, myself and my friends followed closely.

I was introduced to the sport of surfcasting by two experienced anglers that experienced the boom of the 2006 peak and the steady decline to present day. The stories I heard of the blitz's, the amount of bait and fish, the range of sizes caught, and the sheer excitement piqued my interest in the sport. The first schoolie I caught amazed me, my first keeper I will never forget, and I hope to beat my personal best fish caught and released responsibly.

I do not get to fish for striped bass as much as I once did because I now live in Canada and will be relocating to Pennsylvania. Every year I make a point to come back to fish in the spring and the fall. With very few opportunities to fish and with fewer fish to catch, my reason to come out to the coast and spend money becomes harder to justify. To this point the striped bass fishery is worth more as a recreational and economic resource than it is for putting food on the table.

The ASMFC, the intercoastal states, commissioners, and any angler (whether commercial or recreational) need to listen to the qualitative and quantitative research. The striped bass are at a 25 year low and as a collective group need to be proactive. We need to act together and all do our parts to realize this change.

My dream is simply to experience the striped bass at their 2006 levels or better. The stories of the past can become a reality once again and I wish to experience this natural wonder at its full strength. The quality and quantity of fish can be restored and a balance can be found. Stewardship and a coast wide initiative to maintain a plentiful biomass needs to be the primary goal.

Most importantly, I also hope to share the amazing spectacle of the striped bass migration with generations to come.

The time is now, a rebuilding plan needs to be put in place and I request that it be included in the next amendment.

I hope that these interests, requests, and following points are carefully considered.

I also support the technical aspects that the ASGA points out:

1. The Striped Bass Management board has not adhered to the goals and objectives over the past decade

2. The Biological reference points should remain unchanged and removed from further consideration in Amendment 7.

3. The four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management.

4. The 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. In addition, a rebuilding plan for Atlantic striped bass needs to be developed as part of Amendment 7.

5. Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, this issue should be removed from further consideration in Amendment 7.

6. I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

7. I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multiyear study to assess the impacts of various fishing methods and gear types on
striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

8. The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

9. I ask that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

10. I request an inclusion in Amendment 7 for guidance expanding on human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, which could ultimately inform stock-specific management.

Thank you for your time and collecting these responses for the public comment period.

Sincerely,

Casper Crouse

Comments

From: Leif Gobel <leif.gobel@gmail.com>
Sent: Saturday, April 03, 2021 12:13 AM
To: Comments
Subject: [External] Save our Striped Bass

The Atlantic States Marine Fisheries Commission (ASMFC) is seeking input on the initiation of Amendment 7 to the Atlantic Striped Bass Fishery Management Plan (FMP). In my view here's the ASMFC's chance to be a HERO or a ZERO. Come up and implement changes that help Striped Bass to rebound again and be a hero to Striped Bass Management. Or be a zero by caving to special interests that really do not care to help Striped Bass to thrive.

Here's what I believe can help in helping Bass recover.

Remove states ability to implement alternative strategies. Maximize cost effectiveness of current information gathering and ensure that quality and accuracy of collected data is improved and not diminished. Maintain the current 1995 reference target of 125% and don't lower the bar. Lastly, eliminate Conservation Equivalency.

I'm 65 years old and I've been fishing actively for bass for over 50 years. I have lived through the bad in the early 80's and saw what happened when the moratorium was in place from 1986 to 1990. When the fishery was reopened completely for all states there was a 1 fish at 36". All of this allowed the bass to thrive for nearly 2 decades. Please make the hard decisions now that will give the bass a chance to recover and allow future generations to enjoy a recovered resource. You know what needs to be done so please do it!!!

Leif Gobel
1100 N. Sea Dr.
Orient NY 11957

Sent from my Verizon, Samsung Galaxy smartphone

Sent from my Verizon, Samsung Galaxy smartphone

Comments

From: Todd Norton <tnorton087@gmail.com>
Sent: Friday, April 02, 2021 10:27 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern,

I wanted to take this opportunity to inform the Commission of my concerns about the health and future of the striped bass fishery. I am an avid and experienced fisherman, that has targeted stripers on the North Shore of massachusetts for 20 years. In the past 5 years or so I have watched the number of keeper sized fish decrease dramatically. I know a few fisherman that have given up on striper fishing all together due to this. I don't buy into the excuses that "they have moved off shore" etc. I fish by boat. We don't have the seal problems Cape Cod has. Yet we are seeing far fewer keeper sized fish. The keeper sized fish that are still around are hunted down by the coordinated efforts of charter boats. If not by charter boats, the bigger fish are taken by "commercial" fisherman by the snag and drop technique with live pogies.

I am for the conservation of this prized fish. The VAST majority of anglers catch and release striped bass with little desire to harvest their catch. I applaud the circle hook regulation on live bait. However, this is simply not enough. I am in favor of a 10+ year or permanent moratorium on the harvesting of striped bass. I would like my 1 month year old son to be able to enjoy the thrills of catching keeper sized fish like I once knew with great frequency, not just a few a year if lucky.

I don't believe the charter boats will feel any impact with a moratorium, because like I said the vast majority of anglers are happy to snap a picture and release.

Please consider these comments. I believe I represent the vast majority of recreational anglers.

Thanks,
Todd Norton
Beverly, MA

Comments

From: Ray Simpson <rocksimpson@outlook.com>
Sent: Friday, April 02, 2021 9:51 PM
To: Comments
Subject: [External] Striped Bass PID

Atlantic States Marine Fisheries Commission
Hello,
It is my opinion that the Striped Bass fishery is over fished and continues to be over fished.
At most 1 bass over 36" should be the limit. The slot fish does not work.
Even a moratorium is fine.
Stop the pre spawn fishing.
Also Jersey should be in line with the other states.
Tom Fote is atrocious and does not represent the recreational angler.

Thank you for reviewing my opinion.

Ray Simpson
1 Annette Rd
Fairfield NJ, 07004

Comments

From: Tony Fleck <fleckworld@yahoo.com>
Sent: Friday, April 02, 2021 4:06 PM
To: Comments
Subject: [External] Striper Public Information Document

Dear ASMFC,

I am going to keep this short. I lived through the moratorium in the 80's which as an avid surfcaster for Stripers was no fun but it was truly remarkable to see the Striped Bass rebound from near extinction. We are again faced with very difficult times concerning the low bio mass of the Striped Bass. Everyone needs to get on board to save the Stripers if we want the species to survive and have future generations of young fisherman enjoy catching them. It's also just as important to save the menhaden as it is I believe they are one of the most important fish in the ocean. Please try and put aside your differences and do what's right to save the Stripers and Bunker. Thank you for your time.

Tony Fleck
18 Alexander Drive
Farmingdale, NY 11735
516 761-6080

Comments

From: Sue Bertoline <suebert2@aol.com>
Sent: Friday, April 02, 2021 3:52 PM
To: Comments; James Gilmore; Maureen Davidson; Emerson Hasbrouck; Sen. TODD KAMINSKY
Subject: [External] Comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission

Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board,

My name is Susan Bertoline and I am a recreational fisherman. I have been fishing for 30+ years, with NY being my home waters. My husband and I book our vacations around fishing destinations. Once again, I am asking that the ASMFC listen to the recreational anglers and hear our pleas to save our beloved striped bass.

Two years ago, I stood before some of you at the Long Island meeting and pleaded the same message. In fact, most in attendance did the same. In addition, I also took time off from work to drive to New Hampshire to attend the October meeting, knowing in my heart the ASMFC would do the right thing and listen to the outcries of the fisherman to save the striped bass that were over-fished, and over-fishing was still occurring. My heart broke at that meeting, when against the wishes of most, a slot limit was decided. It was like no one heard the wishes and wants of the people they are supposed to be representing and they certainly didn't hear the wants of the striped bass to be protected.

I don't give up easily, so here I am again asking you to hear the people and make the right decision. Striped bass are still over-fished, and I believe over-fishing is still occurring.

My comments are as follows:

ISSUE 1: Fishery Goals and Objectives

My statement: The goals and objectives needed to manage striped bass are already in place in Amendment 6. Amendment 7 should not have even been brought to the table until the stock had been rebuilt and over-fishing was no longer occurring. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 2: Biological Reference Points

My statement: Lower the reference point? What an easy cop out to fixing the current situation. Yes, the 1995 estimate is still appropriate, for now. Reference points should not and cannot be lower or changed in anyway until the stock is rebuilt….end of story. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 3: Management Triggers

My statement: Triggers 1-4 are suitable to manage the stock. Issue 5 might need to be revisited but not until stock is rebuilt. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 4: Stock Rebuilding Target and Schedule

My statement: We wouldn't need a rebuilding plan if the stock was managed correctly. As that does not seem to be the case, I feel the 10 year rebuild guideline will work for now. **I recommend developing a better rebuilding plan in Amendment 7.**

ISSUE 5: Regional Management

My statement: Now is not the time to split up management of the fishery. All energy should be devoted to rebuilding the stock, not shifting responsibilities and blame around. Nothing should be changed until stock is rebuilt. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 6: Management Program Equivalency (Conservation Equivalency)

My statement: CE should be removed completely from Amendment 7. Maybe, it can be added back in once the stock is recovered. By then, Amendment 8 or 9 will be on the table. How can you allow states to use CE when there is no checks and balances that it is actually doing what the states claims it will? When there is no accountability after their CE exceeds their allotment? **I recommend this issue be removed from further consideration in Amendment 7. If you are not willing to do that, then states must be held accountable when they exceed their allotment and it needs to be deducted from the their allotment the following year.**

ISSUE 7: Recreational Release Mortality

My statement: I believe increased awareness and education will go a long way in decreasing recreational release mortality. I believe we should wait until Massachusetts finishes its study to assess post-release mortality before making any changes other than education. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 8: Recreational Accountability

My statement: This is a much larger issue, that is valid and needs to be addressed, but it'll take much more than can be addressed here at this time. We need to move now on rebuilding the striped bass in a timely manner, and can't afford to wait. **I recommend this issue be removed from further consideration in Amendment 7.**

ISSUE 9: Coastal Commercial Quota Allocation

My statement: I have nothing against commercial fishing if it is not causing any further over-fishing to occur. I would think the 1972-1979 landings period is a little outdated and should be revisited. I believe both sectors are responsible for the rebuilding of the stock.

ISSUE 10: Other Issues

My statement: I believe now is the wrong time to start a new amendment. So much time is being wasted on it instead of on rebuilding an over-fished stock while over-fishing is still happening. **I believe no amendments should be worked until the stock is rebuilt and no longer over-fished.**

Thank you for your time,
Susan Bertoline
Floral Park, NY 11001

Comments

From: Ron Moore <nh2loud@gmail.com>
Sent: Friday, April 02, 2021 3:02 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern:

I am a recreational saltwater fisherman for the striped bass species. I have been fishing Maine, New Hampshire, and Massachusetts for more than 25 years. When I heard there was a possibility to restrict the taking of striped bass of any size for approximately a 10 year period, I was "all in". I've had good years and bad years, but one thing is for sure, there is not a enough restriction to make up for people poaching these fish. I usually limit myself to taking one fish a year if that. I feel the punishments for these mass poachings is not near strict enough. I think for the preservation of the species, that a 10 year restriction is fair so long as catch and release is still an option. This combined with the other limitations such as the use of circle hooks should prove to increase the striped bass population dramatically. I also think more observation/stake outs should take place during the late evening hours. I have witnessed too many times people taking illegal size and quantities of striped bass. Well, there is my two cents. Thank you for allowing my input.

Comments

From: Rick Hickox <rickhickox517@gmail.com>
Sent: Friday, April 02, 2021 2:53 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane
Subject: [External] Comments on the PID for Amendment 7

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission

Ms. Franke,

I'd like to express my opinions regarding the Striped Bass Amendment 7 Public Information Document. Given the current situation of a 25-year low in spawning and the overall consensus that the striper population is in decline, I believe we must take substantive action to insure that stocks rebound and that we can maintain a healthy population now and in the future.

As a lifelong recreational angler and passionate surf fishing enthusiast, I'm an advocate for managing for the abundance of the species rather than for yield. I believe that an abundance of striped bass will benefit all interested parties in this magnificent fishery, and it is our best chance for sustainable populations now and in the future.

Additionally, I think the 1995 reference year should remain unchanged. It is an appropriate target year and we can't afford to lower the SSB thresholds. In terms of rebuilding the stocks, I think that a ten-year timeline should be accelerated by all means possible to minimize the risks of collapsing stocks. Finally, I feel strongly that Conservation Equivalency has not worked as envisioned and, therefore, should be eliminated.

Thank you for the opportunity to comment on this critical issue. Not only does a healthy, sustained Striped Bass population benefit all anglers, commercial and recreational, it benefits coastal communities, tackle shops, restaurants, and myriad other businesses up and down the striper coast. Managing for abundance is, in my estimation, the common-sense approach to saving this magnificent and popular species.

Sincerely,
Rick Hickox

Comments

From: John Turvey <turveyj90@gmail.com>
Sent: Friday, April 02, 2021 12:49 PM
To: Comments; TOM FOTE; C. LOUIS BASSANO; HEATHER CORBETT; Joe Cimino; Russ Allen; captadam@karenannii.com
Subject: [External] Striped Bass Amendment 7 PID Comments

Dear Commissioners,

I am writing to you because I am very concerned about the status of Striped Bass. I am a New Jersey fly and spin surf angler and have been in the sport for 18 years. I speak from the perspective of an almost exclusively catch and release fisherman. I started fishing in 2003, when striped bass were at their more recent peak and have had the unfortunate experience of seeing striped bass stocks get to where they are today. It pains me to see the striped bass population at a 25 year low. Striped bass fishing is a huge part of my life and I travel up and down the Northeast coast pursuing striped bass. Along the way, I spend a significant portion of my disposable income on travel, fuel, and tackle. In recent years I have decreased the number of charter trips I take annually because of decreased availability of larger striped bass. Recreational catch and release angling is a powerful economic engine along the East Coast which could dry up if we don't do our part to protect these fish.

Conversations with charter captains, friends along the coast, and personal experience all agree with what the data is telling us. The species is contracting. With less competition striped bass are more concentrated in fewer places. Anecdotal reports of excellent fishing by boat fishermen using 21rst century electronics don't override the fact that striped bass are less dispersed. Whether on boat or on shore, anglers are traveling further and having to hit more spots to locate fish. This is supported by comments of NJ striped bass fisherman in the New Jersey PID hearing discussing the number of anglers illegally targeting bass in the EEZ. Those anglers sought bass in the protected zone because they were so limited inside the 3 mile line. In years where striped bass were more abundant, more bass traveled along the shoreline and this was not an issue.

The following are my comments on the Amendment 7 PID:

Issue 2: Biological Reference Points- 1995 continues to be an appropriate benchmark for managing the fishery and is a reasonable goal. Lowering the biological reference points will only serve to justify continued exploitation of the species and prevent the possibility of a more fulsome recovery by lowering the goalposts. 1995 represents a year in which the species was deemed recovered and fish of all year classes were represented. A healthy fishery requires fish of all sizes to sustain itself.

Issue 4: Stock Rebuilding and Target Schedule- ASMFC should adhere to the timeframe of a ten year rebuilding plan. The longer we delay, the greater the chances that we will see radical negative outcomes for the species. Now, as part of Amendment 7, is the time to develop a rebuilding plan. Waiting until 2022 will benefit neither striped bass, nor the commercial and recreational interests of the public.

Issue 6: Conservation Equivalency- The North/South migratory patterns of striped bass mean that if we are to use Conversation Equivalency, it is of critical importance to get it right. States like Maryland, NJ, and NY that host populations of spawning and pre spawning stripers have the responsibility of managing the nursery to protect the species at large. In the last couple years, this has not been the case, with Maryland in particular far exceeding its mortality targets. This is a surefire way to prevent the recovery of the striped bass and cannot continue. ASMFC should either eliminate conservation equivalency or penalize states who exceed their CE quota in subsequent years. Considering the striped bass' overfished status, CE is dangerous to the stocks and should be discontinued as a management strategy.

I am very encouraged by ASMFC's work with Atlantic Menhaden and am seeing greater abundance of Menhaden than I have in years. I hope that you will take action now to prevent another striped bass moratorium and to protect the species for future generations. The longer we delay, the more challenging that recovery will be. Thank you for considering these comments and your efforts in managing one of our most underappreciated and vitally important natural resources.

Best,

John Turvey

John Turvey
211 Walnut Ave #2F
Cranford, NJ 07016

Comments

From: Veritys102@optonline.net
Sent: Friday, April 02, 2021 11:03 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

ASMFC Board Members,

I would like to add my comments about the Striped Bass Interstate Fishery Management Plan, Amendment 7.

The goals and objectives of the plan are sound but the board has not taken steps to prevent the decline of striped bass stocks and start a re building plan when the information was available. Myself and people I know that fish for striped bass, have seen that the number of striped bass we caught was decreasing for the last 10 years as my log book indicates. The 1995 biological reference point is appropriate and should not be lowered. If this point is changed, than all the data that relates to the 1995 biological reference point will be considered invalid. The time it would take to get new data from a new lower reference point and implement changes to the management plan would take time that I feel we do not have.

Management triggers that are currently in place for striped bass are suitable as long as the board acts on them when data shows that striped bass stocks(or any other fish stocks) are declining. The 10 year, (or less) rebuilding target schedule in Amendment 6 should be carried into the rebuilding plan for striped bass in Amendment 7. Regional management should be removed to due the fact that this species migrates great distances along the eastern coast so that it is the same fishing stock. Data is lacking otherwise. Conservation Equivalency changes state by state and when any fishing stock is on decline should be removed. It serves no purpose for one state to have different regulations when rebuilding a fish stock. A fish that is returned to the environment in one state to meet its conservation equivalency requirements and then kept in another state because of their conservation equivalency requirement serves no purpose. The fish that was saved, is now dead and can't reproduce.

Recreational accountability should be taken out unless the states are going to put more Conservation Officers in the field to enforce the laws. I see many times, hooks are ripped out of a fishes mouth then thrown back dead. People keeping out of season fish, undersize fish or keeping more of a species that is allowed is wide spread. This is a big problem and without enforcement, will continue. If I call my state DEC, no body shows up to check. Without enforcement, recreational accountability is meaningless.

Commercial allocations should be reviewed because the data being used is over 50 years old. The allocations they have should be changed. Then do not apply today because 50 years ago the fishing stocks were more abundant. Commercial fishing gear has not changed to curb by-catch. Some regulations on what fish they can keep and size limits should be considered a crime because it wastes a resource. Years back many recreational fishing persons where finding thousands of dead striped bass floating in the waters off the coast of South Carolina. It was discovered that commercial draggers were allowed 50 fish/day. They were killing thousands of bass to sell the large ones to maximize profits, then throwing all the smaller dead bass back. What about long liners that cut off large tuna, sharks, and other species of fish because they are only allowed to take swordfish? This is a waste of a resource and is allowed because or regulations put on them by the states. Maybe a better commercial approach would be to allow them to sell all that they kill until they hit a given dollar amount, enough to keep the business profitable. Then the can fish rod and reel where by-catch is lower. The effect would be that they would get profit faster and use less burn less fuel which would be better for the environment.

In closing, We have to do more to help all species of fish, not only striped bass. Fish stocks are under tremendous pressure from both commercial and recreational fisher people and is only going to increase over time. All governing bodies that regulate fishing resources should be working together and not as a independent regulatory agencies. We don't want striped bass to go down the road of the winter flounder, or codfish that were almost wiped out of existence because dragging methods became so efficient. If all parties work together, we will be able to rebuild stocks for food and enjoy the art of fishing for many years to come.

Thank you,
Robert verity
102 Liberty Avenue
North Bellmore, New York 11710

Comments

From: Mike Evans <evansm989@gmail.com>
Sent: Friday, April 02, 2021 9:40 AM
To: Comments
Subject: [External] Striped Bass PID

To Whom It May Concern,

Throughout the last several years it has become increasingly apparent that striped bass are an overfished population. I strongly believe that it is your sole duty to manage this fishery to prevent the further development of this issue. Now we have reached a scenario where we are being reactive rather than proactive; unfortunately some of these reactions that have been put in place will cause further damage to this important gamefish. I feel that it is imperative that you ask yourself the question - *do we feel we have properly protected and managed this fishery?* I sincerely hope that your answer is no and that you seek immediate ways to stop the damage that has been done and allow the fishery to rebound and grow.

You must stop looking to the recreational community to fulfill your civic duty. Conservation and capitalism need to find a common place. Unfortunately I fear that you are working more to protect the interests of those who make money from this resource than the actual resource itself. Your job is, and has been, to protect these fish. You have failed miserably and the plight of the striped bass are solely in your hands. Grow some balls. Do your job.

Best,

Mike Evans

Comments

From: Jeff and Erika Palmer/Rurka <jeffanderika9@gmail.com>
Sent: Friday, April 02, 2021 9:14 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] PID for amendment 7

Hello,
I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Harsher penalties to recreational poachers. Also, the need to fine commercial fisherman for breaking laws for over the limit and under sized fish.

I feel the need to stop using multiple treble hooks (they to too much damage to a fish).

Thank you, There is nothing better than watching kids catch a striper. lets preserve this great fish.

Jeff Palmer

Comments

From: Stephen McNeil <steve@mymcneil.com>
Sent: Thursday, April 01, 2021 9:17 PM
To: Comments; Dan Mckiernan; Raymond Kane; Sarah.Peake@mahouse.gov
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Emile Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission

Dear Emile, cc MA ASFMC Commissioners:

I am writing to you today as not only a striped bass angler, but more importantly, a father who wants to ensure the fishery is preserved for my daughters (and their children).

As an avid saltwater angler for the past 25+ years, I have witnessed a steady decline of the Striped Bass population. I thank the ASFMC for seeking comments and immediate action on the following points to change the current trajectory to help build the population back to a healthy stock:

1) I support an aggressive rebuilding plan, even if it means less fishing access for myself over the coming year(s). The ASFMC declared the stock overfished over 2 years ago, and I'm not aware of a plan to address this.

2) Remove the 'Goals & Objectives' from inclusion in amendment 7. The issue is not the goals, but rather the commitment to adhere and enforce current standards.

3) Suggest that 1995, approximately when I started chasing stripers, to remain the year that is used for the biological reference point.

4) Stock Rebuilding in amendment 6 should be maintained.

5) Remove Regional management from amendment 7.

6) Conservation Equivalency should only be enforced when there is evidence of overfishing.

7) Recreational Release mortality should focus on community outreach.

8) While I hold myself accountable, the ability to enforce this is not attainable. I suggest removing from amendment 7.

9) Recommend that the ASMFC support research to better understand the individual spawning stocks and impact of all state fisheries along the coast.

Thank you for considering these comments, and your efforts to preserve the fishery for future generations.

Sincerely,

Steve McNeil
27 Village Drive
Walpole, MA 02081

Comments

From: Stephanie Mazarakis <stephanie.mazarakis@gmail.com>
Sent: Thursday, April 01, 2021 9:08 PM
To: Comments
Cc: James Gilmore; Emerson Hasbrouck; Sen. TODD KAMINSKY
Subject: [External] Comments

Dear ASMFC,

Please consider these comments when drafting amendment 7.

Objectives and Goals: should not be changed. Everything possible should be done to rebuild a our striped bass fishery.

Biological reference points. **Striped bass should be managed for abundance**. We want more fish of all sizes in our waters. Keep 1995 as the goalpost year.

The rebuilding target/schedule should be implemented ASAP and as short possible.

Get rid of Conservation equivalency. It's no good!
Conservation Equivalency must go!

Consider imposing a moratorium to ensure goals and objectives are met

--
Stephanie M. from NY

Comments

From: John Dameron <jdameron3754@gmail.com>
Sent: Thursday, April 01, 2021 9:07 PM
To: Comments
Subject: [External] Striped Bass PID

I , John Dameron from Kinsale Va , am thankful for the opportunity to comment on the striped bass PID. I would like to thank Emilie,Toni and staff for the enjoyable public hearings. I would like to see Biological reference points to reflect management for stability and not abundance. Abundance can have negative affects on other species. Also causing striped bass to compete with each other for limited food sources. I support CE measures and separate regional management for the Chesapeake Bay area. Reducing recreation release mortality equals reducing recreation pressure !! The sport of catch and release is overwhelming the striped bass fishery. Thanks sincerely John Dameron

Comments

From: Bob Shriber <bobshriber@gmail.com>
Sent: Thursday, April 01, 2021 8:56 PM
To: Comments
Subject: [External] Striped Bass Preservation

To Whom it may concern:
As an avid recreational Striped Bass fisherman I want to make sure the Striped Bass population stays strong and continues to grow.
I have fished through the years when we thought the bass were plentiful .So plentiful that we caught and sold our fish without a second thought. Then the fish completely dried up. Fishing every night when in the past there was great success to putting in even more time and coming up empty.
I have seen tthat Striped Bass conservation has mattered and has been a success. But it must be maintained!
I think the idea of a slot size is a good one. With only one fish allowed per fisherperson. There should be no commercial catch. The commercial fishery has decimated the fish and wiped out any attempt by the recreational fisherman to save the fish stock.
I am in favor of a fish slot size with one fish per recreational fisherman. No commercial fishery for at least a year to allow a good fish class size to survive.
Bob Shriber
Aquinnah, Massachusetts

Comments

From: tom matulonis <solexa23@gmail.com>
Sent: Thursday, April 01, 2021 8:57 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello,

I am writing to you regarding the striped bass amendment 7, fishery management plan.

I strongly believe that the stock is overfished with way too many breeders being killed. There needs to be a strong rebuilding plan created and unlike in the past, implemented.

I also understand that there has been talk of shifting the date of the biological reference point. The date of 1995 seems to be appropriate and I believe we should continue to use this date moving forward.

I would also ask that you strongly review the use of conservation equivalency by states to try and dodge the rebuilding plan. Here in the state of New Jersey where I have lived all my life, our fisheries managers and proxies have always voted in favor of killing more striped bass. Having all states adhere to one size and bag limit would be best in my humble opinion.

Thank you so much for your time and consideration.

Regards,

Thomas Matulonis

Comments

From: Dom Dave <sewerchildren@gmail.com>
Sent: Thursday, April 01, 2021 8:46 PM
To: Comments
Cc: James Gilmore; Emerson Hasbrouck; Sen. TODD KAMINSKY
Subject: [External] PID Comments

Dear ASMFC and ASMFC commissioners,

Thank you for allowing us (the public) to submit our comments and help in fight for our fishery.

1. Objectives and Goals should not be changed. Everything possible should be done to rebuild a thriving striped bass fishery.

2. Please do not change the biological reference points. Please manage for abundance. Abundance of overall populations of striped bass over the complete range of sizes and ages. We all want to see the numbers and size ranges of fish that we have seen in the mid 1990's to mid 2000's.

3. Management triggers should remain the same, but should be adhered to and reacted to swiftly and aggressively.

4. The rebuilding schedule should remain at 10 years or less and should start immediately. Please do not wait until stock assessments are done in 2022 to start aggressively rebuilding the stocks.

7. Please consider eliminating Conservation Equivalency (CE) as an option in amendment 7. Do not allow states to set their own rules and regulations. The science isn't there to prove the effectiveness or lack thereof of CE. Conservation Equivalency must go!

other comments: Please stop succumbing to industry and monetary pressure when making and revising striped bass rules and regulations. Science and accurate stock assessments should be the one and only thing that dictates changes in rules and regulations.

Please consider imposing a moratorium for striped bass for at least 2-5 years or a tag system similar to what deer hunters use.

--
Dominic Dee

Comments

From: Alan Berger <bergersmac@gmail.com>
Sent: Thursday, April 01, 2021 8:33 PM
To: Emilie Franke
Cc: Comments
Subject: [External] Amendment 7

Hi Emilee , as a recreational fisherman living on Long Island, I would like my following comments to be submitted and be put on the record regarding the ASMFC Striped Bass Amendment 7 proposal . As a recreational fisherman living on Long Island i would like all efforts in managing the Striped Bass to be geared towards having an abundant stock biomass .I also believe that 1995 is an appropriate reference year.

Regarding the Striped Bass fishery and the conservation and preservation of it:

1-First and foremost strive to increase and re-build the existing and future spawning stock to an abundant level , with fish from all birth years represented, along the Mid-atlantic and New England coast until scientific studies have proved that striped bass are neither overfished nor are we experiencing overfishing.

2- ASMFC must respect the triggers put forth in Amendment VI through language that will hold ASMFC accountable if protection triggers are ignored .

3-Protect and restrict the harvest of the current population of Striped Bass entering the current slot limit (28″) this season .

4-Institute a MANDATORY online education program for anglers, to be taken when applying for a saltwater fishing permit targeting conservation , proper equipment use (such as using circle and inline hooks) as well as best practices & techniques for catch and release of Striped Bass and Bluefish.

5-Encourage tackle manufacturers to move towards using single inline hooks on plugs and lures that are used to target Striped Bass & Bluefish.

Alan Berger
Assistant Director
516-647-1391
bergersmac@gmail.com

Comments

From: Mike Auspaker <hattrickmike3@yahoo.com>
Sent: Thursday, April 01, 2021 8:08 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments

I agree with the points made in the lecture. Im from east coast fish Long Island. I'd like to see more bigger class fish. Have seen big numbers of school bass up to 25 inches in good numbers however the larger class have been lacking greatly. Maybe a slot size of 26-30 inch for keeping fish is a better regulation then 28-35.

-Mike Auspaker

Comments

From: Chet & Lynn <fishy2@optonline.net>
Sent: Thursday, April 01, 2021 7:56 PM
To: Comments
Subject: [External] STRIPED BASS PID

Thank you for the opportunity to offer comments on the Public Information Document for Atlantic Striped Bass Amendment 7. My comments will be limited to Issue 6, Management Program Equivalency (Conservation Equivalency).

Background paragraph 2 states: "The primary motivation for more recent CD programs has been for states to propose alternative measures to ameliorate social and economic impacts of actions to reduce harvest."

Conservation equivalency clearly allows states to adopt measures other than those chosen by the management board, provided that such alternative measures provide the same (equivalent) benefit. While this is a noble cause, it has created a situation in which states attempt to comply with the FMP without substantially disrupting their fisheries. This has become an opportunity to evade management measures designed to reduce fishing mortality with no consequences if the equivalency turns out not to be "truly" equivalent.

Background paragraph 3 states: "As a result, CE programs, once implemented, typically become the new baseline for future regulatory changes for that state and fishery."

I would propose that the plan address the consequences to a state if its CE program is judged to be non-equivalent or out of compliance. The process and application of CE is detailed in the Commission's Conservation Equivalency Policy and Technical Guidance Document. The document, however, offers no guidance to the Board if a post-implementation review of the state's CE effectiveness finds that state's FMP was not truly equivalent.

Another issue is that there are no limits on the number of CE proposals that a state may offer. This requires extensive, laborious review, and the state faces no consequences if the proposals are adopted and do not achieve CE.

Sincerely,

Chester S. Zawacki
New York

Comments

From: George Baldwin <baldwingr@yahoo.com>
Sent: Thursday, April 01, 2021 7:49 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] AMENDMENT 7 TO THE INTERSTATE FISHERY MANAGEMENT PLAN FOR ATLANTIC STRIPED BASS

I'm George Baldwin. I'm a 53 year recreational fisherman and an educator at a school concentrating on marine biology and technologies. I'm president of the CT Surfcasters' Association and have been involved in grassroots fisheries conservation for over 30 years. These are my opinions on the proposed additions to Amendment 7.

ISSUE 1: Fishery Goals and Objectives
My statement: The goals and objectives from Amendment 6 are valid tools for effectively managing striped bass, if fisheries managers actually work toward those goals. Merely stating your goals isn't doing the job, working to reach them is. The goals and objectives should be left as they are, it's the neglect of those goals and objectives that needs to change. We've waited too long without taking action to correct the problem, let's get on it.

ISSUE 2: Biological Reference Points
My statement: I can't even believe that there is actually a proposal to lower the bar. As if Issue 1 wasn't a big enough copout. If you're neglecting working to reach your goals and objectives, how can you say they can't be reached? If I used this way of thinking I'd say that I can have all my students achieve an A+ average, just by changing the grade of A+ to anything scoring a 50% or above. And I most certainly would not lower my standards to make them fit the lowest performing students. Biologists haven't said that the stocks can't be raised to the levels they were at in 1995. There has been absolutely no evidence to back that falsehood. If we lower the bar, we'll forever be hoping that ASMFC will put some effort into bringing numbers up to that underachieving status, just like we've been hoping for with the existing target biomass for the past several years. Please ignore any recommendation that we lower the bar. If your children's school proposed to improve your children's education by lowering the bar, would you think that was a good idea?

ISSUE 3: Management Triggers
My statement: Leave the management triggers where they are. Keep your finger off the trigger, unless you wanna kill the fishery.

ISSUE 4: Stock Rebuilding Target and Schedule
10-year rebuilding timeline. Moving the timeline back would only delay action that is needed now to get the stocks back in shape. Every year lost is a lot of money lost to our economy not only in commercial fish sales, but in the huge economic contributions of the recreational striped bass fishery. Tackle shops, manufacturers, guides and charter captains, hotels, motels, restaurants and many other businesses depend on striped bass fishermen.

ISSUE 5: Regional Management

My statement: We need to rebuild now, not watch businesses and fishermen suffer as ASMFC tries to build new management structure that depends on techniques that are not yet available, such as differentiation of separate breeding populations by genetic analysis to manage local stocks separately. That's coming soon, but let's not come up with more reasons to delay remedial action. Please keep this issue out of Amendment 7. The assumption of mostly male fish in Chesapeake Bay should be backed up by data gathered and analyzed in scientific studies if it is to be referenced in policy-making. Let's stick to facts. Facts are supported by data.

ISSUE 6: Management Program Equivalency (Conservation Equivalency)
My statement: When stocks are in need of rebuilding as seriously as they are now, at their lowest point in 25 years, it is not a good time to grant flexibility to states to come up with their own plans. If some states protected fish above 35" while others protected fish below 35" in a migratory species, the whole population gets fished and none are protected. We've had states continue to overfish stocks that were supposedly being rebuilt by using conservation equivalencies, and not have to pay back the difference. Equivalencies might be appropriate with healthy and stable stock levels, but let's not play around with that when the situation is seriously precarious, like now.

ISSUE 7: Recreational Release Mortality
My statement: This is a normal factor. A good percentage of recreational fishermen choose to harvest few or no fish, but some die after release due to the stresses of being played and landed. Education on proper release techniques can help fishermen learn to fight fish quickly enough to minimize buildup of harmful cortisol and lactic acid, minimize handling time and air exposure and proper reviving through increasing oxygenation before release. Numbers that still don't make it can take the place of recreational fishing harvest of years past. Such education is the best way to handle this issue. I do support the use of circle hooks for live and dead bait, such as livelining menhaden or fishing live eels. Justin Davis has a great understanding of this issue, and his ideas are sound.

ISSUE 8: Recreational Accountabiliity
My statement: This is a much larger issue, endemic to management of all species, that is valid and needs to be addressed, but it'll take much more than can be addressed here at this time. We need to move now on rebuilding the striped bass to a more robust SSB in a timely manner, and can't afford to wait, bogged down by an issue as large as this. Let's put this aside for another conversation of its own

.

ISSUE 9: Coastal Commercial Quota Allocation
My statement: The data from the 1970s is suspect as to reliability, due to harvester reporting not being required and some selling fish in other states making accuracy of state estimates sketchy at best. Population distribution is very different since that decade, between 40 and almost 50 years ago. There are other complications with the commercial quotas, also, making allocation complicated.

Commercial allocations must be adjusted to account for changes incurred in the striped bass population distribution since the 1970s, such as climate change and warming waters altering forage, striped bass habitat and range, and migration patterns. And this will need to be done on a continuous basis as these variables continue to change.

Comments

From: Conor Sheridan <crsherid@gmail.com>
Sent: Thursday, April 01, 2021 6:01 PM
To: Comments; marine.fish@mass.gov
Subject: [External] Striped bass management comment

Dear Striped Bass Fishery Managers,

My name is Conor Sheridan and I am a Massachusetts native, a Father, a Recreational saltwater fisherman and a Seafood lover.

Going forward I would like to see Striped Bass Fishery managed to a level of **ABUNDANCE**

- **Significantly** reduce mortality and build back an abundant and sustainable Striped Bass population.
- Over-conserve rather than under-conserve.

How do I think these goals should be Accomplished

1. **Temporarily Ban Harvest of Striped Bass** - No harvesting Striped bass (both commercially and recreationally) until it is **abundant** again

   - Why I am recommending this:

     - Economically more important as a sport fish than as table fare.
       - **I spend multiple thousands of dollars per year in my local economy targeting striped bass.** This includes lodging, for-hire guide services, local tackle shops
     - The Commercial Striped Bass Fishery is not a majority source of income for any commercial participants. There are many "Recrommerical" participants
     - Other table fare fish such as Black Sea Bass are thriving and could offset this recreational and commercial loss
     - The striped bass is America's Fish. It is the Bald Eagle of the Sea. We should treat it with the same respect.
     - Striped bass are slow growing. Therefore "Keeper" sized fish buildup much higher toxin levels than many other fish
     - I previously supported the slot limit but the Fish currently approaching 28 inches are some of the largest year classes and need to be protected as they reach spawning age.

- While I firmly believe this is the right approach, some additional options that may work are:

    - **Tag system & Ban Commercial** (similar to hunting)
        - Would allow the number of harvested fish to be capped.
    - **Very High Size Limit & Ban Commercial:**
        - 42" or higher with a Charter Boat Limit of 2 Fish per boat

2. **Increase education**

    - Improved fish handling (including reviving fish prior to releasing)
    - Encourage Catch and Release
    - Educate people on how old a big striped bass is – they will be more likely to respect that fish.
    - Get plug makers to adopt 1 hook and inlines as standard

3. **Have a consistent coastwide regulations (Do away with "conservation equivalent")**

    - A fish that migrates up the coast should be treated consistently up the coast.

4. **Outlaw treble hooks when targeting striped bass (and bluefish).**

    - Faster Release times
    - Less Physical Trauma to fish
    - Does not impact fisherman if everyone is on a level playing field

5. **Protect the Menhaden and other Crucial baitfish**

    - Striped bass deserve to eat the menhaden over the farmed salmon

Conor Sheridan

Crsherid@gmail.com

617.922.1135

Comments

From: Andy Lilienthal <andy@campwinnebago.com>
Sent: Thursday, April 01, 2021 3:03 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments on Amendment 7

To whom it May Concern,

I have 2 comments on Amendment 7 that I feel strongly about.

Regarding Biological Reference Points, I feel that the 1995 benchmark should remain. The fact that the Striped Bass Management Board has failed to maintain a healthy Striper stock is not a good enough reason to lower the benchmark in defining what a healthy Striped Bass population is.

In regards to Conservation Equivalency, I believe that there should be NO Conservation Equivalency. It adds a large amount of uncertainty to managing an already declining stock. Uniform regulations along the entire coast are an absolute must. States currently utilizing Conservation Equivalency are not being held accountable for when they overfish.

Striped Bass numbers are at a 25 year low. We have the rare opportunity to reverse this trend, but drastic steps need to be taken starting today.

Many thanks,
Andy

Andy Lilienthal
(207) 767-1019

www.campwinnebago.com
https://twitter.com/campwinnebago

Comments

From: Ryan Conceicao <ryanconc55@gmail.com>
Sent: Thursday, April 01, 2021 2:23 PM
To: Comments
Subject: [External] PID- Striped Bass

To Whom it May Concern,

This year of all years it has clearly become apparent that striped bass are an overfished population. It's is your sole duty to properly manage this fishery to prevent problems like this. Now, we have reached a scenario where we are being reactive rather than proactive. Do you feel as if you have properly protected and managed this fishery? I hope your answer is no. Stop looking to the recreational community to fulfill your civic duty. Conservation and capitalism need to find a common place. That's your job and your performance thus far has proved inadequate. Do better.

Best,

Ryan

Comments

From: Alex <quepega@yahoo.com>
Sent: Thursday, April 01, 2021 11:06 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Save our Stripers

We are the upper reaches of the migration and undergo stricter regulations than some below our state.

I feel That the whole coast should be under one goal/effort and should follow the same parameters and accountability.

Alex...

Do what you love!

Comments

From: Brackish Flies <geoff@brackishflies.com>
Sent: Thursday, April 01, 2021 10:21 AM
To: Comments
Subject: [External] Re: Striped Bass Fishery

Hello,

I am a recreational striped bass angler in Massachusetts and I am appalled at the actions taken by the ASMFC in the past weeks and months in response to the state of the striped bass fishery. In addition to fishing for bass myself, I am a guide who takes great pleasure in sharing the world-class striped bass fishery with my clients, at least I did before we found ourselves in the midst of another crash.

The fishery is crashing and we are well en route to a repeat of the desolate 80's while those in power just keep putting the pedal to the metal and finding ways to get there as quickly as possible. I am disgusted, but not surprised, by the continued mismanagement of our most precious fishery. I am in FULL support of Stripers Forever and their request for a 10 year moratorium of the harvest of striped bass, and moreover, I feel they should have game-fish status up and down the east coast.

Everyone loves striped bass, until they're all gone. The short-sightedness of the commercial industry, the piss-poor management by the fisheries managers (ASMFC, DMF, etc), none of it is going to benefit any of us in the long run, and in fact, will only serve to further exacerbate the situation. Extend the commercial season? You gotta be freakin' kidding me... So, by all means, pinch your pennies, take your kick-backs, play favorites, see where it gets you, cause when the striped bass are all gone, we're coming for you.

Get your heads out of the sand, look around, and vote with your hearts and minds, not your wallets. The whole angling world is watching.

Angrily,

Geoff Klane
54 Jenness Street, Unit 1
Lowell, MA
01851

Comments

From: elizabeth packer <lizzysbs@gmail.com>
Sent: Thursday, April 01, 2021 10:19 AM
To: Comments; Dan Mckiernan; Sherry White; Rep. Sarah K. Peake; Michael Armstrong
Cc: stripercomments@gmail.com; South Shore Fly Casters; Oscar Thompson; Lucy Thompson
Subject: [External] Striped Bass

The Osprey arrived on the salt marsh yesterday and the herring and the Bass will soon follow, as will the gulls and the fishermen the young the older the sportsman and the Commercial fishermen, generations of whom were and continue to be essential to the vitality of our coastal New England communities
The Striped Bass,and their ecological partners the Osprey, the River Herring, Eelgrass & Bay Scallops have faced pollution, habitat loss and overfishing before and have made remarkable comebacks.

I think we have taken that for granted.
We have cleaner waters, we have public access through conservation efforts, and we now can appreciate a vital and fragile connection: To the environment, to a culture, to knowledge and experience , an ethos, an art and a passion that cannot be found in a book on a dusty shelf. This connection is real, it is alive It is The Striped Bass and it is in trouble.
I can not assume to tell you how to make decisions regarding stocking rates, population analysis or anything involving a graf --I can only try to tell you why ,and Implore you to think harder on your impactful decisions.

As I take future decision makers to the shore, sometimes to fish, they are captivated by the open space, the wind and the waves, how the moon moves the tide and the creatures that reside there and how they themselves can reside harmoniously together. This experience is shared, cherished and important.
They become champions of it. They can become the future of conservation, the future of fishery science, the future of global climate policy, ecology and commerce. Future leaders with a perhapes special place in their hearts for a very special fish.

,
Thank You.
Elizabeth Packer
Mother-Conservationist-Fly Fisher
Vineyard Haven Massachusetts

--

Comments

From: James Christopher Tracy <jct@channingdaughters.com>
Sent: Thursday, April 01, 2021 10:13 AM
To: Comments
Subject: [External] comments Striped Bass PID

To whom it may concern:
Below are my comments

"How would you like management of the Atlantic striped bass fishery to look in the future?"

I would like the Atlantic Striped Bass Fishery to look stronger, more abundant and sustainable in the future!

The primary issues considered in the PID are:
1. Fishery Goals and Objectives

There seems to be a lack of consistency from state to state with rules and regulations. The commercial boat regulations, especially gill net boats, needs to be re evaluated.

2. Biological Reference Points

It seems the 1995 estimates need to be updated!

3. Management Triggers
4. Stock Rebuilding Targets and Schedule

In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?

Does it need to be one extreme or the other?
Can't a virtuous median be the goal!

5. Regional Management

The Chesapeake fishery is clearly in trouble from many accounts and needs help.

6. Management Program Equivalency (Conservation Equivalency)
Should CE be part of the Striped Bass FMP?

No

7. Recreational Release Mortality

Unfortunately I believe it is much higher than 9%

Should management focus on reducing the rate at which fish die after being released alive through additional gear restrictions similar to recent actions regarding the use of circle hooks (e.g., banning gaffing or the use of treble hooks)?

Ban gaffing ...Yes
Treble hooks...NO

Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released?

No

Should management consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released?

Like no catch and release fishing out of season in winter or early spring? Maybe

What are some ways to improve awareness and stewardship of the resource?

Maybe require a test to get your fishing license
A short course and testing for knowledge of proper fishing techniques and regulations and catch and release strategies could go a long way
That might reduce the amount of fisherfolk and effort too by just needing to pass a test to get a license.

8. Recreational Accountability

Should the Board consider implementing an RHL for recreational striped bass management?

No it does not seem accurate

Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?

Again maybe greater evaluation for distribution of fishing incense, require education and a test of basic knowledge! Knowledge is power!

9. Coastal Commercial Allocation

1972-1979...really?

Should this Amendment address commercial allocation or be considered in a future management action?

Yes

Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation?

Absolutely not!

Should other allocation approaches be considered?

Gill net boats need to be re evaluated
What we see wash up on shore after they set their nets is crazy
Not that they need to be eliminated but improvements could be made.

10. Any other issues concerning the management of Atlantic striped bass

Impacts due to climate change, including possible loss of prey due to changing environmental conditions;

Yes this should be a research priority!

• Habitat degradation;
I am all for alternative energy built how will the proposed wind farms affect the habitats?

• Limited resources for law enforcement; and
Their could clearly be more enforcement of bad apples but resources are indeed scarce...more funding?

• Research priorities
Yes...climate change!! Change/evolution of habitats...

Thanks for the opportunity
Save the Striped Bass

James Christopher Tracy
Winemaker/Partner
Channing Daughters Winery
1927 Scuttlehole Road, P.O. Box 2202
Bridgehampton, NY 11932
tel: 631-537-7224
fax: 631-537-7243
www.channingdaughters.com
www.twitter.com/CDWwine

Comments

From: Brandon Angell <brandon.s.angell@gmail.com>
Sent: Thursday, April 01, 2021 10:03 AM
To: Comments
Cc: stripercomments@gmail.com; Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT
Subject: [External] striped bass management

Just wanted to share my thoughts after reading through the public information document for the interstate fishery management plan for striped bass. I, like many other concerned recreational fisherman, feel that 1995 is an appropriate reference year and the biological reference points should not be changed at this time. I believe that the 10 year rebuilding timeline in amendment 6 should be maintained and that a rebuilding plan should be initiated for striped bass as soon as possible. Finally, conservation equivalency should only be considered if striped bass are neither overfished not experiencing overfishing. I strongly believe that striped bass are worth much more to the economies of the north east alive and thriving and we should be doing everything possible to ensure both strong numbers of fish and a diverse range of size/age class in the population.

Thanks for the consideration on these matters, Brandon Angell

Comments

From: Mark Jaquith <tojakes@gmail.com>
Sent: Thursday, April 01, 2021 9:22 AM
To: Comments
Subject: [External] stripercomments@gmail.com

Dear ASMFC,

I have 2 comments on Amendment 7 that I feel strongly about.

Regarding Biological Reference Points, I feel that 1995 benchmark should remain. The fact that the Striped Bass Management Board has failed to maintain a healthy Striper stock is not a good enough reason to lower the benchmark in defining what a healthy Striped Bass population is.

In regards to Conservation Equivalency, I believe that there should be NO Conservation Equivalency. It adds a large amount of uncertainty to managing an already declining stock. Uniform regulations along the entire coast are an absolute must. States currently utilizing Conservation Equivalency are not being held accountable for when they overfish.

Striped Bass numbers are at a 25 year low. We have the rare opportunity to reverse this trend, but drastic steps need to be taken starting today.

Sincerely,
Mark Jaquith
Bath, Maine

Comments

From: Al <alsgonefishing2000@yahoo.com>
Sent: Thursday, April 01, 2021 7:58 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striper Regulation

I have 2 comments on Amendment 7 that I feel strongly about.

Regarding Biological Reference Points, I feel that 1995 benchmark should remain. The fact that the Striped Bass Management Board has failed to maintain a healthy Striper stock is NOT a good reason to lower the benchmark in defining what a healthy Striped Bass population is.

In regards to Conservation Equivalency, I believe that there should be NO Conservation Equivalency. It adds a large amount of uncertainty to managing an already declining stock. **Uniform regulations along the entire coast are an absolute must**. States currently utilizing Conservation Equivalency are not being held accountable for when they overfish.

Striped Bass numbers are at a 25 year low. We have the rare opportunity to reverse this trend, but drastic steps need to be taken starting today.

Al Heath
Bath, ME
Alsgonefishing2000@yahoo.com

Comments

From: Scott Hoffer <scott.a.hoffer@gmail.com>
Sent: Thursday, April 01, 2021 6:39 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7 Comments

Hi, my name is Scott Hoffer. I'm a recreational fisherman for Striped Bass (primarily in Maine)

I have 2 comments on Amendment 7 that I feel strongly about.

Regarding Biological Reference Points, I feel that 1995 benchmark should remain. The fact that the Striped Bass Management Board has failed to maintain a healthy Striper stock is not a good enough reason to lower the benchmark in defining what a healthy Striped Bass population is.

In regards to Conservation Equivalency, I believe that there should be NO Conservation Equivalency. It adds a large amount of uncertainty to managing an already declining stock. Uniform regulations along the entire coast are an absolute must. States currently utilizing Conservation Equivalency are not being held accountable for when they overfish.

Striped Bass numbers are at a 25 year low. We have the rare opportunity to reverse this trend, but drastic steps need to be taken starting today.

Comments

From: TODD DINOIA <todddinoia@comcast.net>
Sent: Thursday, April 08, 2021 11:39 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Emilie Frank and Members of the ASMFC Atlantic Striped Bass Management Board,

I am a resident of MA and long-time recreational striped bass fisherman within New England. I am writing comments in regards to the Public Information Document (PID) for Amendment 7 to the Interstate Management Plan (FMP) for Atlantic striped bass. Overall, I am concerned with the current state of the Atlantic striped bass fishery and ask that you take measures to improve the protection and conservation of the fishery that results in rebuilding of the stock. Please manage the striped bass fishery for abundance and outline measures to reduce mortality rates and prevent further overfishing. Please take actions that will help rebuild the Atlantic striped bass population.

Select Comments:

Issue 1) Fishing Goals and Objectives: Continue to strive for low mortality rates that result in continuous annual net increases in abundance throughout the population. Maintain coastal-wide regulator consistency across the Atlantic fishery and ensure actions taken are consistent to achieve outlined goals and objectives.

Issue 4) Stock Rebuild: Additional measures should be taken to proactively rebuild the stock, with clear targets and frequent assessment of triggers. Please initiate a rebuilding plan for Atlantic striped bass population.

Issue 5) Regional Management: Improve stock assessment tools. Be creative in engaging fisherman (both recreational and commercial) in assisting with assessments. Consider increasing licensing fees across states to fund development of better tools and models.

Issue 6) Conservation Equivalency. Do not feel conservation equivalency is working properly for the current state of the fishery, especially when overfishing is occurring and there is a concern or decline in the overall health of the striped bass population. CE appears to have been abused by some states and can jeopardizes conservation efforts across the Atlantic coast. More uniform measures should be taken across all states to achieve consistent conservation goals that prevent overfishing and aim to rebuild the stock coastal-wide in coming years.

Issue 7) Recreational Release Mortality Rates: Request action be taken by the board to further reduce mortality rates of released fish by utilizing multiple approaches. First, focus on training and education of anglers for proper / safe catch-n-release. Second, continue to provide recommendations for gear (like circle hooks) that are safer for striped bass. Consider increasing licensing fees to fund education, training, and outreach and/or incorporate into the licensing process across all states.

Issue 8) Recreational Accountability: Not opposed to RHL or measures that move towards an increase in catch-n-release.

Issue 9) Commercial Quota Allocation: If addressed in this amendment, request regular adjustments of removal limits that better reflect the state of the fishery. Consider potential near-term reductions of the commercial harvesting quotas to have a coastal-wide impact on rebuilding the Atlantic striped bass population and moving towards abundance.

Regards,
Todd

Comments

From: Sal <flyfshr1@mac.com>
Sent: Thursday, April 08, 2021 11:22 PM
To: Comments
Subject: [External] Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street,
Suite 200A
N Arlington, Virginia 22201

Ladies and Gentlemen,

As a person who started fishing in the early 1970's and continues to fish today, I felt it necessary to comment on the Striped Bass PID. I fished through the lean striper years of the late 70's and early 80's and can't understand how it is that we are back in the position where the fishery has been so thoroughly depleted. How did we, and by we I mean ASMFC and the other stakeholders in the resource, let the fishery decline to these levels? I am asking that rhetorically of course but I am concerned that the current PID is contemplating different plans that will manage the fishery, not for abundance, but for harvest. The fact is that the plan that was implemented back in 1984 which included, as you know, a five year moratorium has already proven that the Striped Bass population is able to recover back to abundance in a very short period of time. I feel very strongly that something very close to this plan of action is what is needed. These are my thoughts on some of the issues and some of the other steps that could/should be taken.

- Poaching is a terrible problem. It is blatant. Those of us who play by the rules report it where possible but the truth is there is not enough manpower available for effective enforcement . Some kind of a striper tax or striper tags (much like deer) could be implemented but the funds should used to support increased manpower for enforcement. Increase the penalties and fines for poachers. Make it hurt a little. I bet that helps curtail it.
- Angler education should be expanded. There are people out there who don't know how to properly handle and release a striped bass to increase its chances of surviving. It can start with anglers who know better but I feel there must be some kind of organized push to get it going. Perhaps some of the tackle shops, charter boats , guides etc could all be compelled to make sure their customers know how to properly release a striper.
- As I mentioned above, the actions taken back in 1984 got us back to a "abundant" population. This could be achieved again but we need to take more aggressive action. The slot limit is a good idea but they are set on a 10 year timeline to rebuild. We need to move faster. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness, and we collapse. Why not just rebuild over 3 years, or 5 years, instead of the 10-13+ years it now is suggesting it will take?
- The biggest joke would be lowering the SSB thresholds. As I said above, the plan implemented back in 1984 has already shown that the fishery can recover relatively quickly with proper management. Lowering the bar is the WORST thing that we could do.
- On the subject of conservation equivalency, I do not believe it works in practice. . It allows states to escape regulation, and has done nothing but result in more dead fish. There is ZERO accountability when a state misses. I feel it should be eliminated and we should all play by the same rules.

In closing, I would say that all parties to this debate want the same thing: More fish and better management. I have faith that ASMFC will come up with a viable plan. I have no problem restricting my harvest now or living with a moratorium now, if it will mean a healthier fishery in the future.

Thank you for your time
Sal Miciotta
Seaford, NY

Sent from Mail for Windows 10

Comments

From: Jake Naso-Kushner <birdshark@gmail.com>
Sent: Thursday, April 08, 2021 11:02 PM
To: Comments
Cc: Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY; 2021stripedbasspid@gmail.com; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Greetings,

Please find my comments to the pending amendment 7 to the Striped Bass Interstate Fishery Management Plan.

1. Do not change the goals and objectives and do not include a discussion to do so in amendment 7. Instead, follow the goals and objectives that have already been established.
2. 1995 should remain the biological reference point. Do not include discussion of changing this in amendment 7.
3. Maintain and follow triggers 1-4 relating to mortality and spawning stock biomass. Do not change them.
4. Keep the 10 year rebuilding plan contained in amendment 6 and develop a stronger plan for amendment 7.
5. Remove the regional management from consideration as part of amendment.
6. Stop conservation equivalency. If using conservation equivalency, hold states accountable if they fail to meet objectives.
7. Remove recreational release mortality study from amendment 7.
8. Remove recreational accountability from amendment 7 except for states using conservation equivalency.
9. Update commercial allocation to reflect current state of fishery.
10. Support better research on individual spawning stocks.

Thank you,
Jake A. Naso-Kushner
New York

Comments

From: Bob Geis <BobEGeis@aol.com>
Sent: Thursday, April 08, 2021 10:58 PM
To: Comments
Subject: [External] Striped Bass PID

Here are my suggestions:

1. Please aggressively rebuild the stock on a quicker timeline – I would support a 5 year moratorium.
2. Aggressively educate anglers so as to decrease the mortality rate.
3. Commercial regulation values used in the 1970's should be re-examined to see if those values are valid today.
4. Implement aggressive enforcement & follow-up on violators of the rules and regulations. Poaching is rampant as is the illegal selling of fish. What good are rules and regulations if there is little enforcement?
5. Manage for the abundance of these majestic fish.

Thanks for taking the time to read this.

Robert Geis
(BobEGeis@aol.com)
Long Beach, NY

Sent from Mail for Windows 10

Comments

From: katie egan <katieegan@yahoo.com>
Sent: Thursday, April 08, 2021 11:00 PM
To: Comments
Subject: [External] Striped Bass PID

Hello! Thank you for reading my comments. With the continued decline of striped bass numbers, I believe that a ten year moratorium on harvesting is needed. I would also like to see a continued reduction in commercial menhaden fishing.

I am a recreational, catch-and-release angler. I only use single hooks with crushed barbs and never bait. One sure way to reduce the mortality rate of striped bass is to stop intentionally killing them. Allowing the menhaden to flourish will only help the population rebound.

Thank you!

Katie Egan
270 Hartford Ave #2
Wethersfield, CT 06109
860-810-6504

Comments

From: Will Hallett <w288hallett@gmail.com>
Sent: Thursday, April 08, 2021 10:44 PM
To: Comments
Subject: [External] Striped bass regulations

Hello,

I am writing to provide my comments and opinions on the current status of the striped bass population. As a dedicated ocean and nature lover I have pursued my life career in biology to enter the conservation field of the ocean. I have fallen to the striper obsession and I am a catch and release fisherman who has seen the changes of the fishery and noticed the effects of overfishing and the pressures that have driven the striped bass population to adopt new behaviors and venture into different waters and at different times. I wanted to keep this short but I believe the slot method in effect is a step in the right direction but we can do much more than that. A slot limit applies significant amounts of fishing and killing pressure on specific classes of fish which is not idea for the future of the fish population. Potentially a 34 + one fish a day limit is a good result. Also commercial fisherman don't need anymore help to make their Quotas, they can't reach them because there aren't enough fish which means that there are less fish in the traditional spots. In today's fishery you need to go to your 3 or 4th extra spot to find the fish sometimes because of the state the fishery is in. Please know there are a lot of us out there who care please think of us and those who respect these fish with our lives. I go out in the middle of the night while people are sound asleep to fish for stripers and I'm happier than a NFL football player when I'm out there and that is special. Please make smart decisions in these amendments they are important history in a fish that's intertwined in U.S history. Save the striper thanks for your time.
William Hallett

Comments

From: Michael O'Rourke <morourke1323@gmail.com>
Sent: Thursday, April 08, 2021 10:19 PM
To: Comments
Subject: [External] Striped bass pid comments

I believe it is in the interest of all anglers recreationally and commercially to restructure the management strategy currently I place. It is out dated and does not work. The striped bass should be treated the way tarpon are in Florida. A pure game fish. Barbs on hooks must be crushed and one treble per plug if trebles must be used. We are on the fast track to losing this entire fishery again things must change.

Comments

From: Nelson Burkholder <nelbur@gmx.com>
Sent: Thursday, April 08, 2021 10:17 PM
To: Comments
Subject: [External] striped bass PID

I and friends have fished the James river for stripers many times every season since the moratorium. About ten years ago we started to notice that the schools of small fish which had been common, were becoming smaller and fewer in number. In a few years they were gone. We were still catching legal sized fish but they were becoming harder to find. They also were trending larger. Then suddenly they were gone. The stripers along with the fishermen were gone from the James 5 years ago. VMRC should be able to confirm this.

The fact that the small fish were the first to go leads me to believe that the striper problem in the James is due to predation of the young stripers. I am concerned that catch limits or even a moratorium will not address the real problem and run the risk that the spawners will die off before the real problem is addressed.

I am a scientist and have observed that the rise of the blue cat in the James is coincident with the decline of the stripers. I am aware that scientists run a young of the year survey. I would like to see it expanded to look for the second year survival, and maybe even the third year survival.

Virginia has no coordinated fishery management. Game and Inland Fisheries introduced blue cats into the main western rivers to provide opportunities for fresh water license holders. The blue cats have done well everywhere, but have done particularly well in the James. I would not be surprised to find that the other rivers are having similar problems to those in the James, but I have no data on them.

Please look into the young striper problem in the James. Once it is understood you may also understand the problem of other fish that are young in Virginia's freshwater rivers, like shad, white perch, river herring, and maybe even sturgeon.

Nelson Burkholder Jr (formerly of Newport News)

Comments

From: Michael Louie <mk.louie@gmail.com>
Sent: Thursday, April 08, 2021 10:10 PM
To: Comments
Cc: James Gilmore; Maureen Davidson; Emerson Hasbrouck; Sen. TODD KAMINSKY; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear Commissioners and ASMFC staff,

I hope this letter finds you all well and healthy. I'm writing on as one of the founding members of the Brooklyn Urban Anglers Association, a fishing group formed in 2009 focused on exploring New York City's waterways and responsible recreational fishing. I am not at all happy with the Commission's inaction regarding striped bass. The Commission has consistently ignored its own mandates and management triggers, instead favoring what they call "flexibility," which is an uncreative way of maintaining the economic status quo while delaying any real action that could help a diminishing resource. The window is closing, both for striped bass and that economic status quo the Commission bows to.

The public trust in the ASMFC is very low, and this PID does little to instill faith that the Commission is capable of rebuilding the striped bass stocks. The questions it proposes from the opening sentences "[T]he status and understanding of the striped bass stock and fishery has changed considerably which raises concern that the current management program no longer reflects current fishery needs and priorities," throughout the document instill doubt that the Commission can fulfill its mandate and bring itself to meet its own standards. Striped bass are overfished and overfishing is occurring, but the ASMFC has taken little action to rebuild within 10 years as required by their own management triggers. This should have been initiated in 2014 and again in 2019. Now the ASMFC has another opportunity to do what it is required to do by the Commission's own language.

These are my comments on the major issues presented in the PID:

ISSUE 2: BIOLOGICAL REFERENCE POINTS
Changing the BRPs because the ASMFC can't come up with a coherent, effective plan to execute, or even follow their own management triggers and directives is just moving the goalposts. Acceptance of failure due to lack of effort is not an excuse for reconsideration. The answer is NO—do not change the BRPs you established in 2003 just because you've consistently failed to meet the targets.

ISSUE 4: STOCK REBUILDING AND RECOVERY SCHEDULE The Commission hasn't started on rebuilding the stock within 10 years—a process that should have started in 2014. The Commission should attempt to adhere to its own guidelines for rebuilding the stock before it considers changing any timeline. There should not be any changes based on "flexibility" and the Commission should be accountable to itself. There needs to be commitment by the Commission to rebuild the stock and there needs to be actual steps taken to achieving that goal. So far, there hasn't been any.

ISSUE 6: CONSERVATION EQUIVALENCY
Just flat out, no. Conservation Equivalency shouldn't be used when trying to rebuild a stock. There's far too much manipulation and circumvention by commissioners and states to keep the economic status quo even as the bass population upon which it depends drops every year—the lowest it has been in over 20 years. If CE is allowed then there must be accountability and paybacks for failing to meet the conservation goals on paper and in practice. Right now, there are none, and that's not acceptable.

It is frustrating to watch the ASMFC spin its wheels and waste its time coming up with reduced requirements for rebuilding the striped bass stock. The Commission itself created the management triggers and the mandated action

needed and it is the Commission that has failed to do so. The ASMFC has shown no accountability and little willingness to engage in following their own mandates and policies. The Commission owes it to the public to rebuild trust.

Sincerely,

Michael Louie
Brooklyn, NY

Comments

From: Aaron U <aaron.uehara@gmail.com>
Sent: Thursday, April 08, 2021 10:07 PM
To: Comments
Subject: [External] Haverhill/Plum Island Surfcaster

To whom it may concern,

I am a transplant fisherman who grew up in Maui, HI. I grew up in the ocean. Besides surfing, fishing has always been my salvation. I'd run away from home and fish all day.

As an adult, I have moved to the Haverhill area for various reasons. If we ever meet, I would be glad to explain. And since 2008, I lost contact with the ocean. I struggled for years and started fishing in the Merrimack Valley area in 2018. Shortly soon after I joined the Plum Island Surfcasters Club and started to find a new community. In 2019 I found my sobriety and have been in full pursuit of striped bass fish.

As an avid surfer, I started surfing out here first. Shortly soon after seeing Toby Lapinski's wetsuiting Penn video, I started to learn more about wetsuit surfcasting. Throughout the year I go 4-7 nights a week.

My happiness and quality of life rely on this fishery. Sure I could find something else to do. But I have fallen in love with striped bass. It is an amazing asset for the coastal states to have.

And we need to work together to reduce mortality and to promote population growth.

I am in strong support of the moratorium. Amendment 6 named responses to certain threshold marks, but nothing was done. No restriction/enforcement took place. So now drastic measures are needed.

Mahalo,

Aaron

Comments

From: samuel strymish <sstrymish@gmail.com>
Sent: Thursday, April 08, 2021 9:54 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hi, my name is Sam Strymish and I am a recreational fisherman out of cape cod bay. After reading the Amendment 7 PID, the following are my own opinions that I hope management considers when deciding the future of the striped bass fishery that I and so many other anglers cherish.

Issue 1 (Fishery Goals and Objectives):
I believe that the goal of stability in the fishery should be swapped for the stability of the striped bass population(i.e. it is ok to change regulations frequently to protect the species).
For that reason I believe the following goal should be rewritten to reflect that: "Adopt a long-term management regime that minimizes or eliminates the need to make annual changes or modifications to management measures". I think annual changes to management measures are necessary because without them the striped bass population has suffered. Also, it seems striped bass reproduction rates vary wildly even with the same population size, so a constant long-term plan may not be an effective method of maintaining population stability.

Issue 2(Biological Reference Points):
-I believe the 1995 estimate of female SSB is still an appropriate benchmark for determining stock status.
-I think the buffers on the SSB and F targets should be raised to create safer management. (I think *raised* is the right word, whatever would make it more likely to keep the population the same size or larger.)
-I think an abundance of large fish and a diverse age structure are desireable stock characteristics.

Issue 3(Management triggers) and Issue 4(Stock rebuilding target and schedule):
-I am in support of stricter recruitment-based triggers because of low recruitment's contribution to the decline following the early 2000s. I think 3 years is an acceptable time frame but I think the board should consider raising the 75%.
-I also think a new trigger should be added that addresses long term below average recruitment.
-I think rebuilding the stock more quickly is more important than minimizing impacts to fisheries. I would prefer significant changes to rebuild the stock quickly over smaller incremental changes to rebuild the stock over time.

Issue 5(Regional Management):
-I do not think separate regional management programs should be pursued because as stated in the PID a model for this is still only in development. It would only introduce further inaccuracies into striped bass management.

Issue 6(Conservation Equivalency):
I am strongly opposed to conservation equivalency because it is more difficult to evaluate the conservation effectiveness of regulations on smaller areas. It is also easy for individual states to take advantage of.

Issue 7(Recreational Release Mortality):
-I think the board should attempt to reduce the rate at which fish die after being released alive through additional gear restrictions including banning treble hooks and gaffs.

-I think management should focus on reducing effort in the fishery in order to reduce the total amount of striped bass caught and released. I would support a reduction of recreational fishing days or a shortening of the season.
-I support seasonal closures when environmental conditions are unfavorable to striped bass survival when released.

Issue 8 (recreational Accountability):
-I very strongly support the implementation of an RHL for recreational striped bass management. I believe it should be a main focus of management.
-I think stock status should definitely be considered when handling an RHL overage or underage.

Issue 9 (Coastal Commercial Quota Allocation):
-I think this amendment should address commercial Quota allocation.
-I believe the 1972-1979 landings period is ***not*** an appropriate baseline for coastal commercial allocation.
-The coastwide quota should be explicitly set on an annual basis

Comments

From: Frazer Page Dougherty <frazer.dougherty@gmail.com>
Sent: Thursday, April 08, 2021 10:01 PM
To: Comments; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Cc: stripercomments@gmail.com
Subject: [External] Fisherman's Comments re PID

Emilie Franke, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N Arlington, Virginia 22201

By email to: comments@asmfc.org ECH12@CORNELL.EDU, MAUREEN.DAVIDSON@DEC.NY.GOV, JAMES.GILMORE@DEC.NY.GOV, KAMINSKY@NYSENATE.GOV and stripercomments@gmail.com

Dear Ms. Franke and the ASMFC Atlantic Striped Bass Management Board.

I am a 77-year-old fisherperson who has mostly fished both Long Island ocean beaches and the Sound since the late 1960s. I have made occasional trips to fish New Jersey and Cape Cod, but Long Island is my backyard. In the late '60s and '70s, I have seen many twenty-foot diameter, three feet high piles of striped bass dumped on the beach by haul seiners and I myself in those years have taken 35 and 40-pound striped bass from both Long Island Sound rocks and the sandy beaches on Long Island's south side.

That was 40 years ago and while I have seen and caught striped bass in the recent past, they have been few and far between. With exception of one early spring 12" striped bass that swallowed a plug 1/2 his size and was fatally injured, I have not kept a striped bass for close to thirty years. The bass I have caught have not been hung, with few exceptions have not been taken out of the water, are mostly taken with barb-less single hooks, and almost all of my plugs no longer carry treble hooks.

As much as I could hope and dream that those fish would multiply and come back for my son and his son, both who do fish, I know that you, the ASMFC staff, and your fellow state commissioners can help us to maintain, support, and increase the striped bass fishery from Maine to even Florida.

It is now time to comment on the salient points of Amendment 7 and the primary issues considered in the PID.

1. & 2., appear to be adequately addressed, presently sufficient, be removed from Amendment 7, and that 1995 is an adequate BRP.

3. It seems necessary to ensure that Trigger 5 will ensure adequate recruitment.

4. The 10-year plan of Amendment 6 must be set in motion immediately.

5. Proper Regional Management should be tabled until more science is available to assess the stock and its management.

6. Given the present low stock, Management Program Equivalency should not be used, if so used individual states must be held accountable.

7. At present, education on reducing release mortality must be paramount. New studies and data will give us a better picture for future programs.

8. It seems that this may be tabled, except for ensuring accountability in those states implementing CE.

9. I believe that further study is necessary to determine the scope of the commercial striped bass fishery.

10. I believe that further study of striped bass spawning seasons and grounds will give us a better understanding of our future practices to maintain a healthy fishery.

Yours,

Frazer Dougherty
1560 Willow Dr
East Marion, NY 11939
frazerdoughert@gmail.com

Comments

From: Jim Callahan <tiderunr@gmail.com>
Sent: Thursday, April 08, 2021 9:40 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7 to the Striped Bass Interstate Fishery Mgmt. plan

To whom it may concern,

Without hashing over details repeated many times over by many other anglers, I will ask one simple thing of you. It is long overdue for the ASMFC to do the right thing for Striped Bass, a species in dire need of proper management.

Prudent decisions, not inaction, will have the effect needed for the survival of and rebuilding of the stock for the benefit of all anglers.

In closing, please take my comments to heart and do the RIGHT Thing for the Striped Bass. Thank you.

Sincerely yours,
James Callahan

-

Comments

From: Chris Chan <cchan@chanmockarchitects.com>
Sent: Thursday, April 08, 2021 9:24 PM
To: michael.armstrong@mass.gov; Comments
Cc: stripercomments@gmail.com.
Subject: [External] Citizen concerned about striped bass stock and management

To whom it may concern:
Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass. I am a long time recreational saltwater fly fisherman with a house in Westport MA and a boat moored in the east branch of the river. I have been fishing since the 1980's and have seen the striped bass stock rebound through conservation and now collapse through mismanagement. My comments on the PID as follows:

Goals and Objectives
I believe that this issue be removed from further consideration for inclusion in Amendment 7. The goal and objectives are not the problem but mismanagement is.

Biological Reference Points
I think that 1995 remains an appropriate reference year, and hope that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7. We should keep to our original goals not lower them because we have failed.

Management Triggers
I believe Triggers 1-4 are fine. Trigger 5, may not be an appropriate indicator of recruitment failure.

Stock Rebuilding Target and Schedule
I hope that the 10-year rebuilding timeline currently specified in Amendment 6 is maintained and am strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7.

Regional Management
This issue should be removed from further consideration in Amendment 7 until there is enough good science available to inform decision making.

Management Program Equivalency (Conservation Equivalency)
I hope that CE only be considered if striped bass are not overfished which they currently are.

Recreational Release Mortality
I hope that all agencies focus on outreach and education to anglers in order to promote best practices for safe release.

Recreational Accountability
Please remove the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE.

Commercial Allocation
I hope that the Striped Bass Board works with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery. The data used is way out of date.

Research

I hope that Amendment 7 would request more research on the striped bass fishery and propose a method for using the research for future management discussions.

I implore the Striped Bass Board to put the health of the resource first as it navigates the Amendment 7 process.

Thank you for your consideration of my comments.

Very truly yours,

Chris Chan

Christopher Chan
AIA
LEED AP
HERS Associate

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Follow us on LinkedIn and facebook

Comments

From: Connor Lynch <c.lynch1493@outlook.com>
Sent: Thursday, April 08, 2021 9:25 PM
To: Comments
Subject: [External] Comments on amendment 7

Hi,

I would like to submit comments on amendment 7.

I do not think separate management programs for the Chesapeake should be considered. As the largest nursery for striped bass we must protect these fish to ensure they make it out of the bay and into the migratory stock. I am in favor of the same coast wide slot limit for the Chesapeake as I think it will greatly improve our striped bass population. I see 19 inch fish caught and kept all summer in the bay and short fish thrown back to die in the warm summer waters. I think the basis for a healthy population starts with more stringent Chesapeake bay regulations. I acknowledge the economic dependence of charter bay captains in the bay but if we do not protect this resource properly now, we will have nothing left to fish for and these jobs will be displaced forever.

I also do not think the rps should be lowered and I think conservation equivalencies should be done away away with. I believe coast wide limits for all regions is the best path to success.

Thanks,
Connor

Sent from my iPhone

Comments

From: Ryan ODonnell <odizza44@gmail.com>
Sent: Thursday, April 08, 2021 9:25 PM
To: Comments
Subject: [External] striped bass pid

1) We can't lower the biological reference points. The fishery should not be shrunk. We should be NOT be lowering the SSB thresholds, or suggesting that the 1995 value was incorrect in assessing the size of the fishery. In other words, we should not be saying "oh, we'll never get back to that level we had in the early 2000's, so we should just lower the size we manage". This is, by far, the worst thing we could do for the fishery.
2) We should be managing for abundance How many fish we can ensure are alive should be the number one goal. We should be managing the fish, for the fishes sake!
3) We should be more aggressive with rebuilding. We are walking the tight rope between rebuilding, and collapse. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness or pollution factors and we collapse. Why not just rebuild over 3 years, or 5 years, instead of the 10-13+ years it now is suggesting it will take? Why wouldn't we move from a p=0.5 this will work, to something like p<0.3, or the scientific standard of p<0.05? Think now. End the problem before the problem becomes worse. Now is the time.
4) Commercial regulations should be updated from the values used in the 1970's- do we know these are valid anymore? This is very important to look into.
5) Aggressive angler education should be conducted to decrease release mortality.
6)Money- whether through a striper stamp or other means- should be put into enforcement of rules and regulations. Poaching is rampant. Back door, illegal selling of fish is a problem. These issues must be addressed. I have seen it countless times in the past 10-15 years with my own two eyes.

In a perfect world, we would give the fish a break for 5 more years, with no harvest at all. If we are not to eliminate harvest or drastically change, we must take aggressive actions to protect what fish we have. All sides want more fish in the ocean. The ASMFC has failed in this objective, after one of what is arguably the greatest fisheries comeback of all time.

Striped bass has been on a steady decline and is very obvious to those that fish regularly up and down the coast.

Manage for abundance! My two boys are 4 and 6 and I have been teaching them catch and release on all bass with hopes they will someday see some large fish with their own two eyes. If we don't do something quick the decline will continue. Please do the right thing .

Ryan

Comments

From: mariusz@pajecki.net
Sent: Thursday, April 08, 2021 8:44 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

I'm a new saltwater fisherman who just started recreational fishing for striped bass and enjoying that very much as probably most of the saltwater fishermen in this part of the world.

I've joined many public and private groups and forums with the hope of learning more about this beautify species. There is a lot of discussions regarding this amendment with mostly negative feedback from what I've seen.

While following the proposal, I have some feedback I'd like to share:

- Most of data and evidence seems showing the big decline in the population since 1995.
- There is big disconnection between the proposal and fishermen communities opinion.
- Looking at the fishing experience itself, not sure how many of people involved in this proposal are actual fishermen, last few years are really bad compared to previous years form what I've seen and heard (across states).
- Last year, especially was very bad for striped bass fishing - there seems to be not many big fish around shore anymore. Boat people still seem to catch bigger ones but that might be the case of chasing the last schools of big fish.
- Another observation from a beginner fisherman is the lack of big fish reports, considering the widely used social media and forums. With huge increase in fishermen community, we catch less big fish than ever before - even ignoring all the other data, that is really concerning.
- Regarding poor attendance for the hearings across the states: it might be the case of many fishermen not being familiar with technologies and computers - that should not mean they are not concerned with the proposal. During those hearings it should be highlighted that talking to representatives from various forums and communities should be considered as the voice of thousands of concerned fishermen.

I would like to catch and release more big fish but that seems more challenging in last years. It seems like this is becoming a norm and amendment 7 in the proposed form is not helping changing that.

Please consider how much money is spent in local businesses by all the new fishermen, with surf fishing reels reaching over $1k, and how that benefits local businesses and communities and it can all be soon thing of the past if there is no big fish left to catch, which seems like what this amendment is not focusing on in current form. Instead its focus is on harvesting more fish from a declined population.

I fully support the comments, feedback and suggestions that American Saltwater Guides Association raised regarding this amendment.

--
Regards,
Mariusz Pajecki

_____

Comments

From: Sean McDermott <flyfishnacl@gmail.com>
Sent: Thursday, April 08, 2021 8:40 PM
To: Comments; Dan Mckiernan; Raymond Kane; Sarah.Peake@mahouse.gov; Sarah Ferrara
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 Public Comment

To Whom it May Concern,

My name is Sean McDermott, and I am writing to you to provide my perspective on the Striped Bass Amendment 7 Public Information Document.

I have been fishing the areas from Montauk, NY to Plymouth, MA since 2001. Fishing is my passion, and in my opinion the Striped Bass is the most important species available to the Northeast angler, given its span across the region and availability throughout the seasons.

My personal experience has been that of a steady decline in the availability of Striped Bass over the last 6 years. Since 2015, the availability of Striped Bass has become more localized geographically vs. the broader distribution that would indicate a healthy stock. This geographic and size concentration indicate a clear concentration of a few stronger year classes. Of most concern to me, is the larger mass of 25"-27" fish from last year that will become harvestable under the current slot limit this year. I believe it is likely they will be taken out of the biomass before having the full opportunity to reproduce.

From an economic perspective, my fishing passion contributes to the economy in many ways. I have purchased 3 boats since getting involved in fishing, spent money at local tackle shops, used local lodging to travel, and even purchased a new home in Cape Cod to be closer to the water.

As it relates to how to move forward in regards to Amendment 7, I fully support the American Saltwater Guides Association proposals.

More specifically, I recommend the following as it relates to the key issues:

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient to recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Sincerely,

Sean McDermott
PO Box 1292
Harwich, MA 02645

Comments

From: Steven Reardon <stevenreardon77@yahoo.com>
Sent: Thursday, April 08, 2021 8:30 PM
To: Comments
Cc: Sen. Craig A. Miner; WILLIAM HYATT; Justin Davis; ROBERT LAFRANCE; Rep. Melissa Ziobron; 2021striperPID@gmail.com; stripercomments@gmail.com
Subject: [External] Striped Bass PID

To Whom It May Concern,

I am writing a brief note to you to let you know that the Striped Bass is an important part of mine, and my family's life. We love to fish.We spend a great amount of time, and money fishing for Stripers recreationally. We hope you will do all in your power to preserve and enhance this great resource. With that being said here are my thoughts on some of the issues.

Issue 2: I believe that the BRP SHOULD REMAIN UNCHANGED. I don't agree with 1995 being used as the reference year.

Issue 4: I strongly believe that the 10 YEAR REBUILDING PLAN IN AMENDMENT 6 BE MAINTAINED. I would also like to see that REBUILDING PLAN ENACTED AS SOON AS POSSIBLE.

Issue 6: I strongly believe that CONSERVATION EQUIVALENCY SHOULD ONLY BE CONSIDERED WHEN THE POPULATION IS AT A HEALTHY LEVEL THAT IS NOT BEING OVERFISHED.

Thank you,

Steve Reardon

Comments

From: Jay Chenard <jayechenard@gmail.com>
Sent: Thursday, April 08, 2021 8:31 PM
To: Comments
Subject: [External] Issue 2

In regards to Issue 2, I do not support changing the biologic reference points to a year other than 1995. In regards to issue 5, I do not support conservation equivalency.

Comments

From: Peter Schultheis <peterschultheis@snet.net>
Sent: Thursday, April 08, 2021 8:17 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Mr. Franke

I am 68 years old, a resident of Lyme Connecticut and I have been surf casting for striped bass for over 50 years, with most of my fishing taking place in Rhode Island. I am for the most part a catch and release plug caster. Since 2005 I have witnessed a decline in striper fishing and while there have been a fair amount of small fish between 22 and 26 inches in these waters over the past 5 years we seldom see or catch any fish over 34 inches if at all for the whole season. Any fish over 32 inches are scarce. I truly believe we need to collectively step up our stewardship of this great species before we experience another collapse.

I will keep this brief but please consider:

Seasonal closures i.e. reducing the season of any and all types of striped bass harvesting

Consider phasing out the use of treble hooks

Keeping 1995 as the reference year for measuring stock assessment

I hope this helps some but our striped bass clearly need some significant interventions if we want our grandchildren to enjoy this great fish.

Thank You....Peter Schultheis

Comments

From: Matthew Susca <msusca@springfieldcollege.edu>
Sent: Thursday, April 08, 2021 8:10 PM
To: Comments
Cc: Sen. Craig A. Miner; RITCHIE WHITE; WILLIAM HYATT; Dennis Abbott; Cheri Patterson; KEVIN SULLIVAN; Sen. David H. Watters
Subject: [External] Striped Bass Amendment 7 Comments

ASMFC & New England Representatives,

As a New England resident, I have been lucky enough to experience fishing for striped bass in all our coastal states and I feel that the time has come to express my thoughts and feelings on the state of our very delicate fishery. The striped bass population has dwindled to a delicate tipping point from a number of contributing factors.

Namely the recreational release mortality per Amendment 7 in the state of Massachusetts and recreational accountability of casual anglers. In the last year of COVID, we saw coastal residents who stayed at home and took to fishing for striped bass to pass the time. With lack of experience and education from casual anglers, their increased activity contributed to the damaged state of our fishery through poor catch and release practices and lack of adherence to slot limits.

Listed below is the direct wishes of the Atlantic Saltwater Guides Association in regard to preserving the atlantic striped bass population for recreational and commercial intentions:
Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you for your time and efforts!

Matt Susca
Fly Fishers International
Springfield College
MS Sport & Exercise Psychology
860-280-7863
"Civilize the mind but make savage the body"

Comments

From: Sabin Piatek <sabinpiatek@gmail.com>
Sent: Thursday, April 08, 2021 8:02 PM
To: Comments
Subject: [External] Striped bass PDI

Hello, My Name is Sabin. I am a 14 year old surf and fly caster based out of southern Maine. I have been fishing for striped bass for my whole life. I believe that the stock is in a very bad condition at the moment and it has been getting worse every season. My opinion is that there should be a moratorium on Striped Bass for the next 5-7 years. But also i am not anti-commercial, My uncle used to commercial fish for Striped Bass. I have been a part of the Plumb Island Surf-casters for about three years now and i have seen a dramatic decline of all fish (Striped Bass). But i also think a different slot would be better instead of 28-34 i believe it aloud be 30-38. Thanks, Sabin

Comments

From: shawn gibson <sgibso2@yahoo.com>
Sent: Thursday, April 08, 2021 7:43 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

I am a charter captain in Maryland's portion of the Chesapeake Bay. I want to express my concern on what I think has been the biggest negative impact on our striped bass fishery. Summer live-line fishing for rockfish.

While the attempt to adopt the use of circle hooks was a step in the right direction, unfortunately the use of circle hooks inevitably results in a large amount of dead discards, due to deep (gut) hooked fish. We are now adopting minimal closures (2 weeks) for the recreational fishery to meet ASMFC reduction, however, it is too little too late. While recreational fisherman take a 2 week break, commercial hook and line harvest continues. Charter operates who would otherwise be running a charter, use the 2 weeks to fill tags. End result, more Dead discards.

Live-lining for striped bass in Maryland's portion of the Chesapeake is not a new phenomenon, but the evolution of its effectiveness could be considered new territory. Norfolk spot have always been known to entice a rockfish bite, but it wasn't until the early 2000's that we saw the effort to capture 100-200 bait size spot, keep them lively in a barrel (live-well) and efficiently harvest a limit of bass. It became so easy to harvest striped bass via hook and line that the commercial sector of hook and line fisherman dedicated summer months to harvesting fish. Prior to the live-line evolution, commercial hook and line was a fishery of opportunity - early spring, late fall when fish were bunched up and on the move. Total Allowable Catch disbursements had to be adjusted to move quota around to satisfy the commercial hook and line fishery. Which in years prior, had difficulty catching their allowed share.

A small group of elder Charter captains, concerned with the effectiveness of this style of fishing, as well the extra pressure placed on the spot fishery, made the issue known to Maryland's DNR. No action was taken, defaulting to ASMFC guidance. This alarm was sounded around 2007. Fast forward 13 years, ASMfC is drafting new regulation on spot due to low abundance of adult spot, and we see the same in our spot fishery. Headboat operators in the state have been pleading for regulation to minimize the stress placed on our spot fishery so that they can offer their customers opportunity to harvest adult spot. In essence - 2 fisheries are suffering due to lack of regulation and ignoring stakeholder concern.

For charter operators, in the early days of the live-line evolution, we would take customers out to catch spot via bottom rigs with #6 hooks and bloodworm. In today's charter industry, in order to stay on top and keep the edge, you have to fish 10-20 spot pots and commercially harvest spot. Maintain large fish holds dockside which keep 1000's of spot at the ready. These fosh are presumably not reported or at a minimum are under reported. I'm worried that our state has no handle on how many spot pots are being fished, and the magnitude of juvenile spot harvested for commercial and recreational studied bass fishing.

My opinion is not favored by my peers, but I can see the forest through the trees. I'd prefer to see a summer closure during warm months of August and September on the Chesapeake Bay to minimize the burden placed on stripes bass due to dead discards, and the burden on aced on juvenile spot for the harvest of striped bass.

To support my concerns - the live line fishery took off around 2005, by 2010 adult spot indices were below average and have continued to fall below this threshold ever since. It's shameful.

Best regards,

Shawn Gibson
Wound Tight Sportfishing LLC
Miss Lizzy Fishing Charters LLC
410-610-6283

Comments

From: R. Kelly <pmrdoc5@gmail.com>
Sent: Thursday, April 08, 2021 7:35 PM
To: Comments
Subject: [External] Striped Bass

I'm a PA & Maine resident. In fact I recently bought a home in southern costal Maine for the abundance of sport fishing. I am concerned about the regulations that I have read about and the amendments on striped bass. I therefore DO NOT support any other reference point year other than 1995 for regulation of this fish. Please do your best.
-Dr. Robert Kelly
Biddeford, ME resident

Comments

From: joe aiello <joeaiello59@gmail.com>
Sent: Thursday, April 08, 2021 7:32 PM
To: Comments
Subject: [External] Striped Bass PID

what the hell is wrong with you people?maybe you'll be happy when there are no bass left to catch 2020 was my worst fishing season in the last 10 year's

Comments

From: Rey AztecaNYC <reyaztecanyc@gmail.com>
Sent: Thursday, April 08, 2021 7:29 PM
To: Comments
Cc: James Gilmore; Maureen Davidson
Subject: [External] PID Amendment 7

I am writing to express my opposition to changes being made at this time.

I do not support the Biological Reference Point being changed at this time. I believe 1995 is an appropriate BRP and should remain in place.

It is my opinion that the 10-year rebuilding timeline should also remain unchanged and that one should be implemented at this time.

I also support the position... "that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives."

It is time to protect Stripers, not a time to consider changes that could reduce those protections. Let's make sure this wonderful fish is abundant for generations to come.

Comments

From: Marshall White <marshalwhite@gmail.com>
Sent: Thursday, April 08, 2021 6:52 PM
To: Comments
Cc: Patrick Keliher; Stephen Train; Sen. Dave Miramant
Subject: [External] Striped Bass PID

Dear ASMFC Members
The data speaks for itself. But, I feel the need to reinforce what the data says with my own words in hopes that in some way - as Maine resident and recreational angler - that if I speak to those who are charged with representing the fishery - you will think even harder about this endangered fishery.
I'm ready to release all striped bass for 10 years. I encourage a new moratorium (I benefitted from the 1970s version) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan

I encourage Seasonal Closures, no targeting Striped Bass in traditional spawning areas, such as the Hudson River and enforced by local authorities.

And plenty of precedence can help Atlantic Stars issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data. Why not fund the science.

Also I encourage cessation of the devastating practice of the commercial gillnet fishery (Coast and Bay); and Would encourage adopt hook-and-line fishing only where commercial harvest persists

To further focus the picture (which allegedly is blurry to some?) Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.

My saltwater license - which was a boon to states coffers - should be able to fund stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).

Common sense says we should Limit treble hooks to one per artificial lure

And why not Encourage or require barbs on artificial lures be flattened when used for Striped Bass.

Your grandchildren should have the joy of catching a striped bass - not read about 'ol pajamas in a children's book. Do the right thing.
Sent from my iPhone

Sent from my iPhone

Comments

From: Charles Murphy <cwmnecker@comcast.net>
Sent: Thursday, April 08, 2021 6:36 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] PID

I am sending you this letter to express my opinion on what I hope the future management of the striped bass . I am in agreement with the requirement that recreational fisherman must release the breeders in order to assure the continuation of the species. But to allow commercial fisherman to harvest these very same fish, up to 15 per day on commercial days, makes no sense at all. None of the people I know who holds commercial licenses make a living from killing these fish. They could only meet a fraction of their quota last year, which tells you something about the state of the fishery, but that did not stop them from trying to get increased days to fish this year. I feel very strongly that the striped bass should be designated as a game and fish. It's economic value contributed by the recreational community far exceeds that of the commercial catch. Allowing the big breeders to be killed by commercial fisherman while the rest of us must release them makes no sense. Not just for my sake, but for the sake of my children and my grand children, I hope you make the right decisions for this beautiful fish!
Charles W. Murphy
Cwmnecker@comcast.net

Sent from my iPad

Comments

From: Kylecannistraro Cannistraro <kylecannistraro.kc@gmail.com>
Sent: Thursday, April 08, 2021 6:30 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped bass

Hi I think that the striped bass are in danger and we need to do more to protect them. I see people poaching all the time and don't see action being taken. I think that a moratorium would be beneficial. In my area by the Cape Cod canal the amount of poaching I see and the mistreatment of the striped bass is atrocious. I feel that upping the commercial days is going to kill this species at a quicker rate, although I do realize that recreational fisherman are responsible for more killing. I also know that recreational fisherman bring in more revenue yearly all along the east coast. Recreational fisherman need to be more aware of the state of the fishery as many people don't even realize these fish are in decline and continue to take fish unaware of the damage that is being done. Also they need to be educated more on how to properly care for the fish they catch and to practice safe catch and release. I personally do what I can as an individual to keep these fish around for years to come. I use one hook on all my lures, I don't hang fish from the gills in a vertical position for a weight, I don't even take them out of the water if possible. I take the proper amount of time and effort in releasing the fish so they can safely return. Seems as if some of us do a lot to make sure the fish are protected while still being able to enjoy the passion and then the people in charge of protecting these fish (ASMFC) don't seem to care about anything but reaching a quota. If things continue the way they are going you will never reach your quotas as there won't be any fish left to harvest. I hope and pray one day I can pass on my passion and knowledge of fishing to my children and they can enjoy the love for fishing I have. Thank you for taking these comments and I hope you take everyone's opinions into account as we are the ones out there watching this fishery disappear year by year.

Respectfully,
Kyle

Also I'd like to add that the seal population is out of control. I don't think I need to tell you the damage they have already done and continue to do.

Comments

From: Nick Adams <nadams@gmail.com>
Sent: Thursday, April 08, 2021 5:29 PM
To: Comments
Subject: [External] Striped Bass PID

Greetings,

As a lifelong resident of Maryland, and having fished the Chesapeake Bay and Potomac River my entire life, I would like to see a ban on the commercial gill net fishery along the Atlantic Coast and Chesapeake Bay. These individuals have done enough damage to our striped bass fishery. Recommend replacing gill nets with hook and line licenses as applicable. We need your help. It gets worse and worse each year.

Ver Respectfully,
Nick Adams

Comments

From: Alberto <alberto.pina@gmail.com>
Sent: Thursday, April 08, 2021 5:15 PM
To: Comments
Cc: Tkregan12@gmail.com
Subject: [External] Stripes bass PID

Dear ASMFC representatives,

The striper population is in serious decline and you should take urgent actions to stop the downfall. I think that you should declare striped bass a game fish and instute a catch and release across the board and along the striper coast in the northeast. Thank you.

Sincerely,

Alberto Pina

Comments

From: Christian Martin <cmartny@gmail.com>
Sent: Thursday, April 08, 2021 5:03 PM
To: Comments; stripercomments@gmail.com; michael.armstrong@mass.gov
Subject: [External] Atlantic Striped Bass PID

Hello, My name is Christian Martin and I am a recreational striped bass surfaster from Massachusetts. I just wanted to take a moment to provide my feedback on the Atlantic Striped Bass PID to make sure that my voice (and concern) are heard. I will address each point and what I would recommend is the most appropriate action from my perspective to ensure the conservation of this species. I will thank you in advance for your attention.

1) Fishery Goals and Objectives:
I would ask that you please maintain the current goals as I believe they are still very relevant. What I think needs to change is the elimination of loopholes to the execution of the plan which undermine the current goals. Language such as "to the extent practicable" and allowing states the flexibility to come up with "alternate "strategies", in my opinion, prevented quick and effective action from being taken as it became necessary based on our current goals. The plan was good but the execution was laden with loopholes that left it up to interpretation by people with conflicting interests. When our goals indicated it was time to trigger planned steps to stay on track, I instead saw hesitation and inaction due to conflict that shouldn't have even been considered were the rules clear and simple.

Finally, to be completely clear I would like the ASMFC to know that it is my wish that we take all future actions with the goal of building the fishery back up to where it was at the beginning of the 2000s.

2) I support managing the striped bass population with the goal of building back up to the levels we saw in the early 2000s. I DO NOT want to change the BRP and would ask you to remove it from consideration in the development of Amendment 7.

3) Management Triggers
I once again want to make it known that I think the management triggers that we already have in place are totally adequate however what needs to happen is the loopholes need to be removed. If we want this to work we need to set it up with the interests of the fish put first and once we have a plan there should be a clear procedure for execution. We CANNOT leave anything open to interpretation by parties who could have conflicting interests when it's time for those triggers to activate.

I support status quo with regard to Management Triggers and recommend the issue not be considered further in development of a new amendment.

4) Regarding stock rebuilding targets and schedule:
I am in favor of status quo and recommend dropping it from the agenda.

5) Regional Management
I support continued regional management that uses 2 geographical zones:

1. A single coastal migratory management area and
2. the Chesapeake region

What I don't support is regional management strategies that use separate coastal regions and allow for different measurement tools among them

6) Conservation Equivalency
I am completely opposed to conservation equivalency and think it is a major encumberance to the effectiveness of the current management plan.

7) I continue to support the 9% recreational release mortality estimate and regard it as the best available science. I don't foresee any good coming out of pursuing this further and potentially making a small impact in the figure. It only seems possible that if the percentage is lowered then people will start to get a false sense of security and not be as careful and concerned when it comes to recreational release. It could only negatively impact conservation so let's not let it distract us from higher yield considerations.

On another note, I don't believe that seeking further regulation on limiting gear types are worth consideration. I think the bottom line is that only less fishing will lead to significantly less fish mortality. With this in mind I absolutely support the 1 fish bag limit as well as switching to a large minimum size limit as opposed to a slot. I would also support an open and closed season. I think it would allow better assessment and allow you to better manage the impact of fishing during the opportunistic migratory seasons.

8) Recreational Accountability
I recommend that this be considered at a different time for a different agenda. I think this will only succeed in being a distraction during the planning of Amendment 7.

9) I have no comment on this

10) I just want it to be known that in the event a moratorium were considered I would be all for it. I am principally concerned with the conservation of the striped bass and think everything else should take a back seat.

I want to thank you again for taking the time to hear my thoughts and concerns on these topics and I hope that you take them into consideration when taking future actions.

All the best,
Christian Martin
cmartny@gmail.com

Comments

From: Francis Wnek <wnek_fm@comcast.net>
Sent: Thursday, April 08, 2021 5:03 PM
To: Comments
Cc: stripers@stripersforever.org
Subject: [External] Striped Bass PID

Dear ASMFC,

I am a recreational Striped Bass fly fishing angler from Maine. It has been encouraging to me to see the numbers and size of our inshore Striper population increasing over the last several seasons, after a precipitous decline due to commercial overfishing.WE need to continue that positive trend for us and the next generation of recreational anglers.

I fully support:
1) Designation of Striped Bass as a protected species with recreational only, no commercial fishing.
2) Use of barbless hooks and single treble hooks for lures
3) protection of spawning areas during the inshore spawning runs
4) a $25 Striped Bass Stamp for recreational anglers in addition to licensing requirements per state regulation
5) Elimination of the ability of individuals to have both a guide and commercial license and take more than the recreational fisherman limits on guided trips

Thank you.

Frank Wnek
Harpswell, ME

Comments

From: Bill Hespe <bill.hespe@gmail.com>
Sent: Thursday, April 08, 2021 4:58 PM
To: Comments; stripers@stripersforever.org
Subject: [External] Striped Bass PID

I am an active fly fishing angler and fish Massachusetts, Rhode Island, NY, NJ and Maryland with professional guides on an annual basis and support the following:

- Seasonal Closures, no targeting Striped Bass in traditional spawning areas, such as the Hudson River and enforced by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for Striped Bass.

Regards,
Bill Hespe
646-901-4122

Comments

From: Jeremiah Treanor <jeremiah.treanor18@gmail.com>
Sent: Thursday, April 08, 2021 4:56 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Atlantic Striped Bass PID

Hi Dan,

I am writing to provide comments on the PID for the Striped Bass Interstate Fishery Management Plan. Please find my opinions on each topic in the PID below.

1. **Goals & Objectives:** I believe this issue should be removed from Amendment 7. The issue isn't the goals or objectives, rather the fact the ASMFC hasn't adhered to them for over a decade.
2. **Biological Reference Points:** I believe that 1995 is an appropriate reference year and belief that the biological reference points should remain unchanged. This issue should be removed from further consideration in Amendment 7. The fact this management board has failed to maintain a healthy fishery is not a reason to lower the values. Any lowering of these reference points is unacceptable and shouldn't be considered.
3. **Management Triggers:** I believe the four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goals and objectives of Striped Bass management. It may be prudent to review Trigger 5 which attempts to address recruitment failure but may not be an appropriate indicator of such a failure.
4. **Stock Rebuilding Target & Schedule:** I believe the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. In addition, I am strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7.
5. **Regional Management:** Given the combination of current striped bass status and the fact science is not available to inform stock-specific or regional management, I would like to see this removed from further consideration in Amendment 7.
6. **Conservation Equivalency:** I do not believe conservation equivalencies should be considered whatsoever. States should not be allowed to choose CE as they clearly are not effective or equitable in preserving the biomass.
7. **Recreational Release Mortality:** This issue is being prematurely discussed given Mass Marine Fisheries is engaging in a multi-year study to determine the impacts of various fishing methods and gear types on striped bass post-release mortality. With that said, I beleive efforts to reduce mortality should focus on outreach and angler education in order to promote best practices for safe catch and release.
8. **Recreational Accountability:** This is a broader issue that in my eyes is too broad to be addressed via this amendment process. I recommend the removal of this issue from Amendment 7 except as it relates to conservation equivalency.
9. **Commercial Allocation:** I recommend the striped bass board work with the technical committee to update commercial allocations based on the characteristics of today's commercial fishery.
10. **Other Issues:** I would recommend inclusion in Amendment 7 of guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management decisions. I also recommend that the striped bass board support research to better understand the relative contributions of indivudal striped bass spawning stocks to the overall coastal population.

Please make sound and aggressive decisions to preserve the striped bass for the future, and pull them back from the brink upon which they now teeter. These fish have a rich history and are intertwined in our country's story. We have a duty to ensure they are here for the next generation to enjoy.

Best Regards,

Jeremiah

Comments

From: Harrison Connelly <connellyharry@gmail.com>
Sent: Thursday, April 08, 2021 4:47 PM
To: Comments
Subject: [External] Fwd: Striped Bass PID

Hello,

My name is Harrison Connelly a recreational fisherman based out of Rhode Island who is not affiliated with any groups.

Wanted to send my official public comments regarding the striped bass population and how we manage it going forward. My main points are the following.

1) We should be managing for abundance. While I think a moratorium would be alienate some fisherman, we really need to be focusing on preserving the striped bass population. Additionally looking at things like limiting the fish you could keep on a per week basis (1 per week) instead of 1 per day might be good for signaling to people that the population is in trouble. I believe 1 per day sends the wrong message that the striper population is fine.

This means that we should keep our biological reference points with
1995 and not change them. We should not be changing the reference point. Instead we should try to keep the standard high as a goal to reach.

2) Conservation Equivalency: I feel that we need to have various states on the same page when managing the population. When one state can do one thing and another state can do another, it can be problematic due to the fact that there is little accountability between the two. Additionally, from a Data Analyst's perspective, it is much easier when there is a unified effort when making a change. It is far easier to track the changes and see if there is a benefit or not. Instead it is difficult to tell what is working and what is not.
This is an iterative process and needs to be thought of as such. There will likely never be one magic rule to make the process perfect and tweaks and changes will always need to be made. Build the process for long-term sustainability not just for the fish but for the conservationists.

3) If we are to make equipment changes in requirements of what fisherman can / cannot use leave some bufferzone / time to allow the vendors to make the product and for the fisherman to use up their old product. The concept of bucktails with circle hooks is relatively unknown / explored right now and if there was more runway / time there would not have to be an emergency exception made / not made.

Thank you,
Harry

Comments

From: EZ Magnum <ezmagun@gmail.com>
Sent: Thursday, April 08, 2021 4:40 PM
To: Comments
Subject: [External] Saving the striped bass

Hello. My name is Ethan M. and I am a recreational surf angler from Long Island who dedicates his life to catching and releasing striped bass. Growing up in Florida, I had no choice but to learn to cast a rod and live in the water. Shortly after moving to Long Island, I discovered a whole new love for the ocean through the striped bass. Being the undisputed apex predator of our inshore waters without any teeth like I was used to in Florida, blew my mind. And when it came to the sheer size and power these fish put off during a fight is unlike any other. Growing up and fishing here just like everyone else, I have noticed a significant decline in the striped bass population. At points I wouldn't even consider it a decline, I would consider them to completely extinct from certain spots that I used to catch them from as a kid. As a tax payer and citizen here in New York, I find it an unspeakable and immoral crime against our indigenous species by continuing to over fish our local striped bass population to near extinction. There is no time to wait. Our fishery is declining faster than I could ever imagine and we need action FAST. Please consider a recreational moratorium for the striped bass to drastically increase and protect our breeding stock of fish that we still have. While few, we have enough mass to rebuild this population if we take action fast. Please DO NOT wait. My life, passion, enthusiasm and mental health rely on these fish. Thank you for taking this into consideration -Ethan M.

Comments

From: Jerry Williamson <jerrywilliamson50@gmail.com>
Sent: Thursday, April 08, 2021 4:40 PM
To: Comments
Subject: [External] Striped Bass PID

Please do the right thing and protect our fisheries!!! Leave something for our children and grandchildren to enjoy some day. Short term money grabbing is all wrong. Some people will lose jobs but we can't sustain fishing like this

Sent from my iPhone

Comments

From: Patrick Hay <phay6229@gmail.com>
Sent: Thursday, April 08, 2021 4:40 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

April 8, 2021
Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am writing you to provide comments on the Interstate Fishery Management Plan for Atlantic Striped Bass Amendment 7.

I am an active recreational angler that has been fishing the waters of Rhode Island and Massachusetts for over 3 decades. Over that period, I have seen the benefits of management of Striped Bass. There were times in my youth that it was nearly impossible to catch these fish recreationally within Narragansett Bay. Thanks to both environmental and fisheries regulations I have seen vast improvement in the recreational fishery. The critical comment that I want to make is that this species has a tremendous economic impact on the area and the true value and larger impact of the fishery is the to me the recreational value and not the commercial value. As a game fish the Striped Bass is a valuable resource that must be protected. I do not want to see a time that we revert to the low levels of juvenile fish that we have seen in the past and this mean that not only local measures need to be taken but measures that impact the full migration and breeding areas of the Striped Bass.

I am currently in the process of working to obtain my captains licensing in the hope that I can someday work in my retirement as a charter captain. This mean that we must protect these fish and that we need to take the appropriate and necessary actions to ensure these fish are here for generations to come. The board has taken steps to ensure this over the past decade however, it seems that the actions take are often to late to have the intended impact or that the actions are not executed properly. I believe that focusing on the Goals and Objectives of Amendment 6 are still the true Objectives of the Board and that should continue to be the Objective of Amendment 7.

The other area that I wanted to address was recreational accountability. Although commercial accountability is a realistic and obtainable objective the recreational accountability is somewhat harder to implement. I agree that there must be accountability, but this is a very complicated issue and that I believe that resources and efforts can better be placed on improving the mortality rate of recreationally released fish. As I often see may anglers are not educated on how to handle a fish or release a fish to ensure that fish survives or has a high probability of survival. I believe that more efforts should be put into education of anglers.

I thank you for the opportunity to provide some insight into Amendment 7 and I look forward to seeing what the actions for the board will be to protect this vital natural resource.

Sincerely,

Patrick Hay
30 Scott Drive Riverside, RI 02915
Phay6229@gmail.com

Comments

From: thomas rivas <trivas1959@yahoo.com>
Sent: Thursday, April 08, 2021 4:29 PM
To: Comments
Cc: stripercomments@gmail.com; 2021striperPID@gmail.com
Subject: [External] Striped Bass PID

ASMFC,

I wish to have the ASMFC manage the striped bass fishery so it will recovery to the levels it was in 1995 when it was restored. I would like the striped bass fishery managed for abundance.

The goals and objectives are not an issue and should be removed from Amendment 7. The biological reference points should not be lowered. Lowering the goal is not acceptable. I would like to see a more aggressive (5 year) rebuilding schedule put in place. We have lost too much time and allowed the striped bass fishery to decline too far at this point.

Conservation Equivalency should be abolished. It allow states to escape regulations and does not hold states accountable when they under perform.

I would like to see the ASFMC require anglers to take a online course to instruct anglers on the proper method of releasing fish to reduce mortality when they apply for their saltwater registration. It should be a requirement that they successfully complete the course before they are allowed to apply for their saltwater registration. This should be done annually.

Thank you,
Thomas Rivas

Comments

From: Jonathan O'Connor <surfrods@icloud.com>
Sent: Thursday, April 08, 2021 4:26 PM
To: Comments
Cc: stripercomments@gmail.com; Michael Armstrong; Rep. Sarah K. Peake; Raymond Kane; Dan Mckiernan; Sherry White
Subject: [External] Striped bass Amd7 PID comments

Issue 1: The goals and objectives are fine no change is needed with them. The issue was that ASMFC did not stick to them while managing the striped bass over the last decade.

Issue 2: 1995 is the appropriate year. Remove this section from the PID. The fact that the ASMFC has failed to maintain a healthy stock, is a very poor reason to lower the reference points.

Issue 3: amendment 6 triggers 1-4 are appropriate. use them.

Issue 4: the 10 year rebuilding timeline outlined in amendment 6 should be kept. In addition a stocking rebuilding plan must be included in amendment 7.

Issue 5: regional management is not appropriate for a migratory coastal fish.

Issue 6: conservation equivalency should never be used in the management of striped bass due to past abuse by member states and poor oversight by ASMFC. Conservation equivalency should never be considered for an overfished/O.F. Occurring stock.

Issue 7: delay further action untilbetter science is available, like the study being conducted now my MA DMF.

Issue 8: accountability should be expected when a conservation equivalency program fails to meet stated reductions.

Issue 9: this system needs an overhaul. Its 50 years old. While I believe striped bass are better managed as a gamefish. A commercial fishery must reflect today's reality, not 1970s reality.

Jonathan M O'Connor
207 Samoset Street apt c10
Plymouth MA 02360

Comments

From: Joe Philippon <jphilippon@crosscurrentinsurance.com>
Sent: Thursday, April 08, 2021 4:36 PM
To: Comments
Cc: WILLIAM HYATT; ROBERT LAFRANCE; Sen. Craig A. Miner; Rep. Melissa Ziobron; Justin Davis; stripercomments@gmail.com
Subject: [External] Comments for the Striped Bass Amendment 7 Public Information Document.

To whom it may concern in regards to Striped Bass Amendment 7 Public Information Document.

I believe that the current goal and objectives for the fishery are sufficient. 1995 is an appropriate reference year and BRPs should remain unchanged. These issues should be removed from further consideration for inclusion in Amendment 7.

The rebuilding timeline specified in Amendment 6 should be maintained, and a rebuilding plan should be initiated for Atlantic striped bass as ASAP. The Conservation Equivalency should only be considered if striped bass is neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

In addition to the above, guidance for expanding human dimensions research in the striped bass fishery should be included in Amendment 7 as well as the provision for a pathway by which such research could be applied to future management discussions. The Striped Bass Board should support research to help better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers to inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you for your time,

Joe Philippon
Director of Marketing

Cross Current Insurance Group
Direct: 860.507.8906
Office: 833-553-2244 x 8906
Cell: 860-878-7171
jphilippon@crosscurrentinsurance.com
www.crosscurrentinsurance.com



Comments

From: Adam Smith <adam.a.smith928@gmail.com>
Sent: Thursday, April 08, 2021 4:16 PM
To: Comments
Subject: [External] Striped Bass PID

Please consider this one vote to eliminate all retention of striped bass until empirical data proves there is a robust and healthy breeding population.

Zero retention for charters
Zero retention for recs
Elimination of commercial bass fishing

Striped bass deserve treatment as the incredible game fish that they are: zero retention. Watch old videos; look at old pictures; listen to stories of long ago. Let's return to that.

Thank you,

Adam A. Smith
Adam.a.smith928@gmail.com
617-275-9706

Comments

From: Peter Girard <peter@girard.us>
Sent: Thursday, April 08, 2021 4:51 PM
To: Comments
Subject: [External] Striped Bass PID

As a recreational fisherman planning to invest within a year in a custom boat designed specifically for catch-and-release fly fishing for striped bass in shallow saltwater, I fully support a complete moratorium—recreational and commercial—on harvesting striped bass until stocks are undeniably rebuilt to sustainable levels. I am also willing to pay for a stamp or additional license to fund enforcement and programs dedicated to rebuilding and maintain wild striped bass populations everywhere they exist on the Atlantic coast.

I'm old enough to have fished for striped bass when they were rare and minimum legal length was 36 inches; that fishing experience wasn't worth spending much money on. Even now, the value of the fishing experience is worth less to me than it was a few years ago—but I spend at least $4000 per year to fish for striped bass. If the future of the fishery looks promising to me—and Amendment 7 of the Atlantic Striped Bass Fishery Management Plan plays a big part in that assessment—I'm willing to spend much more. But not if ASMFC won't prioritize the population's longterm recovery.

Please treat striped bass as a recreational fishery supporting a massive economic opportunity, driven by a legion of anglers like me willing to pay vastly more to release fish than a handful of operators can make killing them.

-Peter Girard, Rye NY

Comments

From: Mary Rivas <mr-13@att.net>
Sent: Thursday, April 08, 2021 4:00 PM
To: Comments
Cc: stripercomments@gmail.com; J Audet
Subject: [External] Striped Bass PID

Give striped bass game fish status for at least the next five years.
Charles V. Rivas

Comments

From: NORMAN HYETT <flyingfishcharters@mac.com>
Sent: Thursday, April 08, 2021 4:10 PM
To: Comments
Subject: [External] Striped Bass PID

I highly recommend that striped bass be designated as a “game fish” to protect the stock which has been overfished for years. As a fishing captain I have not kept, nor allowed any striped bass caught on my boat to be taken home. Gillnetting these fish is ridiculous, as they are more valuable as a catch-and-release resource then as a food item. With more people buying fishing boats, if they can even find them this year, the pressure on stripers will be even greater. Hopefully there will be more significant fines for those who poach, and for those who sell on the “black market.”

Captain Norman Hyett

Comments

From: Thomas Higgins <higginsphotography@gmail.com>
Sent: Thursday, April 08, 2021 4:06 PM
To: Comments
Cc: 2021striperpid@gmail.com; stripercomments@gmail.com
Subject: [External] Striper Regs

Dear ASMFC
It is with concern that I am writing this to ask those with the power to change legislation to listen and accept the science behind the declining population s of Atlantic Striped Bass
Whether you enact a moratorium or a slot limit, it needs to be done and done now and kept in place for a minimum period of 5years.
Furthermore, enacting a slot on commercial takes would be a great place to start.

Tom Higgins

Comments

From: John Yemma <j.yemma42@gmail.com>
Sent: Thursday, April 08, 2021 3:45 PM
To: Comments
Subject: [External] Atlantic Striped Bass PID

Hello,
My name is John Yemma, I live in Winthrop Massachusetts and I grew up in Ipswich. I am writing with my concerns in regards to the ASMFC Striped Bass PID.

I have been fishing for Striped Bass for around 20 years. It appears that it is clear that the science and anecdotal evidence point to this species being overfished in the region. That all aligns with my personal experience as someone who spends over a hundred days on the water a year primarily targeting the species.

I acknowledge that this isn't just a problem with the commercial fishing industry, and recreational fishermen have played a role in the problems we see today.

We all owe it to the Striped Bass species to do everything we can to help the fishery recover and manage for abundance. What has been proposed in the PID does not make sense in light of the facts. I am writing so that the ASMFC does not move forward with the proposed changes in the document, and instead takes a look at what can be done immediately to protect the fish from more overfishing.

As a recreational fisherman, and one who considers themself an enthusiast, I take responsibility to do everything I can to help -- including but not limited to practicing catch and release at all times (which I have for years), adherence to the latest proper catch and release techniques. and by making a commitment to passing along what I have learned about the status of the fishery and what we can do from the recreational side to make it right.

I believe managing for abundance is not only conducive to the best end result for the fish, but also the best economic outcome for the fishery and all of its constituents as a whole. The Striped Bass is the prize sportfish of the Northeast. Our sport fishing industry and all associated industries and business that support it would face extreme challenges just to stay in business without a healthy fishery. I personally know more than a dozen people whose livelihoods would be put at risk if there is further decline. That being said I would be happy to participate in figuring out a way to supplement the lost income to the commercial fisherman, I am sure they have come on hard times during the pandemic. I'll leave the particulars on methods of how to do that to the smarter, more experienced people who are constituents of this fishery and those who work on the commercial fishing side of it.

In conclusion, I believe what is best for the fish is also best for the economic output of the fishery. And who doesn't love a win-win?

Thank you for taking the time to read my comments.

John Yemma
2 Jerald Street
Apt 2
Winthrop, MA 02152
508-843-0085 mobile

j.yemma42@gmail.com

--
John Yemma
j.yemma42@gmail.com
508.843.0085 mobile

Comments

From: Josh Cohn <joshccohn404@gmail.com>
Sent: Thursday, April 08, 2021 3:29 PM
To: Comments
Subject: [External] Striped Bass Conservation I agree with everything Charles Witek has ever said on striped bass conservation.

One Anglers Voyage is my bible please for the love of the fishery manage for abundance. Charles Witek speaks for the fish and speaks for me. Protect the breeders we have, shepard the young strong year classes. Smaller slots, shorter seasons!

Its a new decade in a pretty new century lets not mess this up.
--
Josh Cohn
(202) 689-4196 | Joshccohn404@gmail.com

Comments

From: Jared Tausig <j2tausig@gmail.com>
Sent: Thursday, April 08, 2021 3:20 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom It May Concern:

As someone who has fished for Stripers for well over 40 years, I wanted to reach out and urge the ASMFC to do the RIGHT THING for the remaining stocks of Stripers.

A look at the data reveals that the fishery is in deep trouble. Anecdotal information from fishers, guides, industry scientists supports this.

Humans crashed the stock in the 70's and amazingly brought them back with keepers at 36". Fast forward to now, and we've either crashed the stock or are on the verge of doing so again!!

I urge you to decrease the pressure on Stripers by raising legal size limits, reducing the # that can be harvested by both recreation & commercial anglers before it is too late.

Thank you.

Jared Tausig
Massachusetts

Comments

From: Barry Woods <barrytwoods@gmail.com>
Sent: Thursday, April 08, 2021 3:18 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Commissioners:
I am an avid recreational striped bass fishermen in MA and ME. I have a boat specifically to fish with (NC Jones Brothers) and I invest time and money in the joy of pursuing them. I have been doing this for over 25 years. I have many friends similarly invested and passionate.

Last year, despite the re-emergence of their key forage fish, menhaden, I seldom saw any bass on them in MA close to the coast and at no time did I see bass on them in midcoast Maine. I fished 30-40 trips last year. I think I kept zero bass last year despite catching hundreds of small fish. They are my favorite sport fish and I release them, but I caught only a few over 30" (that's inches, not pounds). My frustration with how you are managing this fish is INDESCRIBABLE. Despite the presence of small fish, there are few breeders. And MA wants to extend its commercial season as the coup de grace!

At the rate of this fisheries current decline, I doubt I will live long enough to see the second coming of a healthy, diverse population of bass. That is sad commentary on your collective efforts.

I write every year and every year you have a chance to actually alter the future of this fishery, if you can overcome whatever political interests seem to place themselves over those of the fish. You can see that the current year classes coming up have a chance to breed successfully AND to create a system that will fund policing and managing them. As long as I breath and there are striped bass to catch, I will continue to advocate for the conservation and sustainable harvest of this beautiful fish.

To that end, I strongly support the following strategies:

-A commercial and recreational moratorium on keeping striped bass of ANY length for a period of time scientifically found to allow adequate rebuilding of the stock to 1997 levels.
-Strict protection of spawning areas during the spawn and heavy fines/jail time for poaching.
-ELimination of so-called conservation equivalents that allow states (NJ) to thwart the group's decisions.
- Creation of a Striped Bass stamp- like the Northwest does for salmon/steelhead/halbut. This funds research, your salaries, and enforcement if done properly.Moratorium (coast and bay, no recreational or commercial harvest) of 10 years' duration to ensure the success of the ASMFC's 10-year stock rebuilding plan.
Phase out of commercial fisheries- whether gillnetting or hook and line. Do we commercially harvest deer and trout? We may have once. What happened? The public interest actually asserted itself.

Take a moment and think about the next five years and what will happen to this fishery and your responsibilities if you continue to fail? It is about the future preservation of the fish and it requires sacrifice, no matter who you are.

Thank you for your consideration and please act to halt the decline of the breeding stock.

Sincerely,
Barry Woods
363 High Head Rd
Harpswell, ME 04079

Comments

From: Donald Dicostanzo <buzzzzbomb@aol.com>
Sent: Thursday, April 08, 2021 2:45 PM
To: Comments
Subject: [External] Striped Bass PID

Moratorium Of less than 10 years.
2-4 years would be enough for a healthy rebound.
I'm all for crushing barbs but some plugs do not operate properly with one set of trebles. Thats a minimal issue.
Stricter law enforcement on poaching of all species is desperately needed. A fee for the marine registration is definitely a good idea.
DD.

Sent from my iPhone

Comments

From: edward.lovely@aol.com
Sent: Thursday, April 08, 2021 2:25 PM
To: Comments
Subject: [External] Striped Bass PID

- **I recommend a ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists** **Including a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability. Stronger punishments for poaching is needed as well as larger fines and equipment forfeiture. For the sportsman, barbs on artificial lures should be flattened when used for Striped Bass.**

Respectfully submitted. Dr. Edward W. Lovely

Comments

From: Brian Kendall <ebrkrules@yahoo.com>
Sent: Thursday, April 08, 2021 3:10 PM
To: Comments
Cc: Katie Egan
Subject: [External] Striped Bass PID

Hello and thank you for reading my comments. With the continued decline of striped bass numbers I feel a ten year moratorium on harvesting is needed. I would also like to see a continued reduction in commercial menhaden fishing.

I am a recreational, catch-and-release angler. I only use single hooks with crushed barbs and never bait. One sure way to reduce the mortality rate of striped bass is to stop intentionally killing them. Allowing the menhaden to flourish will only help the population rebound.

Thanks.

Brian Kendall
41 Lynch Rd
Lebanon, CT 06249
860 319 7129

Comments

From: Frank Pitzi <n1gdo@verizon.net>
Sent: Thursday, April 08, 2021 3:06 PM
To: Comments
Subject: [External] Striped Bass

I hope that measures are taken immediately to preserve this fragile, precious resource.

I am all for any and all measures that protect Striped Bass.

Thank you

Comments

From: J S <saltfisher@yahoo.com>
Sent: Thursday, April 08, 2021 3:02 PM
To: Comments
Cc: Sherry White; Rep. Sarah K. Peake; Dan Mckiernan; Michael Armstrong
Subject: [External] Striped Bass PID

To whom it may concern,

I am a 62-year-old lifetime angler residing in the Hyde Park neighborhood of Boston. Since I discovered the striped bass fishery in high school I have dedicated myself to the pursuit of this GAME FISH. My vacations and leisure time are centered on the pursuit of stripers. I have fished the Charles River in Watertown Square during the alewife run, Bourne's Pond and Truro on Cape Cod, South County RI, Plum Island, and the Kennebec beaches and estuaries for decades.

My wife and I spend thousands of dollars annually renting cottages, shopping for supplies, eating out, and supporting local businesses from the Bear's Den fly shop in Taunton to Plant's Seafood in Bath. An ideal vacation has us in Maine within yards of the water with our kayaks and my rods ready to go. I also take guided trips and regularly take day trips to the Narrow River in Narragansett, Charlestown Breachway, and Falmouth.

I support all the recommendations outlined by Stripers Forever, especially the criminal lack of a designation of one of the world's greatest sport fish as a GAME FISH. If it walks like a duck and talks like a duck, please don't tell me it's not a duck.

DESIGNATE THE STRIPED BASS AS A GAME FISH.

The commercial fishery contributes so little to the economy compared to the recreational fishery that it should be limited.

The points where I may differ with Stripers forever are I would like to be able to take one fish annually at a size deemed to have the least impact on the spawning population. Perhaps issue a stamp as they do with hunters.

I would also like the option of having a barb on single hooks only. I would like to see treble hooks banned. Most of my flies and lures have the barbs mashed down. I prefer barbless however due to the loss of several large fish last season I would like to have a fly or two with a barb.

Also do everything possible to protect the Chesapeake and Hudson spawning grounds and limit, if not eliminate, the factory fishing of menhaden and herring off the East Coast.

Sincerely,

Jon Seamans
113 Dana Ave.
Hyde Park, MA 02136

Comments

From: Vasilios Siklas <siklasv@yahoo.com>
Sent: Thursday, April 08, 2021 2:32 PM
To: Comments
Subject: [External] Striped bass fishery

The state of the fish is not good
We really need to do something about it
Would love to see it go as a game fish
Please do something to help

Sent from Yahoo Mail for iPhone

Comments

From: Brian Hickey <brianhickey1820@gmail.com>
Sent: Thursday, April 08, 2021 2:27 PM
To: Comments
Subject: [External] ASMFC Draft Amendment 7 PID

Dear Sir/Madam

As a 18+ year recreational traditional and fly fishing (by both boat and shore) enthusiast on the South Shore of Massachusetts and Buzzards Bay please consider the following in your decisions and votes for the path forward with respect to Striped Bass fishery.

Although this is not scientific I have observed a noticeable steady decline in the size, location, and presence of Striped Bass in my locations over my active years.

Also, having grown up in the greater New Bedford region I have also witnessed how groundfish stocks (Cod etc) collapsed and were negatively impacted both the availability of species and the economic stability of commercial and recreational pursuits.

We only get one shot at this environmentally so please advocate and vote to make the striped bass stock the key priority over any commercial harvest interests including enforcing the recommended 10 yr moratorium to rebuild stocks. Please don't let history repeat itself like with the groundfish stocks.

Thank you,
Brian Hickey
781-336-9668
Massachusetts Resident.

Comments

From: janejohn1@comcast.net
Sent: Thursday, April 08, 2021 2:06 PM
To: Comments
Subject: [External] Striped Bass as Game Fish

I support the management of striped bass as a game fish, which may mean limited harvest.

I fish for striped bass in Maine and really think they are a great game fish.

Jane John
Fisherwoman
Brunswick, Maine

Comments

From: bucktail <bucktail8@aol.com>
Sent: Thursday, April 08, 2021 1:59 PM
To: Comments
Subject: [External] Striped Bass PID

Striped Bass need to have some new thinking and new approach My recommendations goes like this
1 bass between 18-28" daily
1 bass over 40" daily
This would allow the population to grow and PROTECT the prime breeding stock which is 28-40"
Current regulations of only taking bass over 28" will NEVER allow the population to grow. This approach work for Redfish/channel bass AND will work for striped bass

PLEASE CONSIDER THINKING OUT OF THE BOX

BILL SHILLINGFORD
BUCKTAIL8@AOL.COM

Comments

From: Richard Booth <reelhapy1@gmail.com>
Sent: Thursday, April 08, 2021 1:10 PM
To: Comments
Subject: [External] RE: Striper issues

I am writing in an attempt to have the ASMFC make a move to change the future of the Stripers in our waters for the future. Over twenty years ago the Hudson River (where I charter) had an abundant number of shad swimming in its water come the spring. The Commerical netters then told all that would listen "there are millions of shad we'll never run out of them". Well after putting in nets after nets for years prior to when it was closed down the Commerical people would catch a hundred or more per netting and rip the roe out of the fish, discard the remaining body and throw it in the water. The males that were caught as by-catch after hanging in the net for the length of the tide or so could not be saved and they were lost also. Well eventually the amount of shad swimming up and down the river were so limited the New York DEC closed the entire fishery both for Commerical netters as well as the sport fishing aspect of the shad run. Let's not let this happen to the stripers by not protecting them from over fishing.

In addition north of the George Washington Bridge on the Hudson River the slot limit is 18-28 inches which is suppose to protect the spawning females. I believe it does but when the fish are either entering or returning to the ocean the slot for the area south of the George Washington Bridge has a different slot that does not protect the spawning females coming or going to spawn. Seems that the most appropriate thing would be for the slot to be the same north or south to protect those spawners! Not a good system for the female stripers.

And finally the amount of policing that occurs for those that don't obey the laws is minimum, there must be eyes watching out for those that are catching too many fish and those of improper size. This is solely needed. Thank you. Captain Richard E.Booth.

Comments

From: Mark Phillips <mark.phillips11@verizon.net>
Sent: Thursday, April 08, 2021 11:16 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Mark Phillips Striped Bass Amendment 7 PID Comments

My name is Mark Phillips from Westerly Rhode Island. I grew up on the water and have worked on the ocean for the last 17 years. On average, I have spent 180 days on average on the ocean for work, fishing, or other reasons. Since 2003, and more recently, I have seen a significant decrease in the quantity and quality of size of (sexually mature) Striped Bass along the Rhode Island, New York, and CT shorelines from the estuaries, beaches, to the inshore waters.

PID comments:

1. Goals and objectives: I recommend this be removed, and focus on physically and legislatively protecting the ASB.
2. Biological Reference Points: I recommend to keep the Biological reference points where they are and keep the 1995 BRP.
3. Management Triggers: I recommend maintaining the management triggers included in Amendment 6
4. Stock Rebuilding target Schedule: Maintain the 10 year rebuild timeline currently in Amendment 6. We are approaching another season in a declining fishery and the lag time associated with changes in law may be detrimental to the current fishery.
5. Regional Management: I strongly recommend this issue is removed from Amendment 7 and increase scientific efforts to learn more about stock specific data.
6. Conservation Equivalency: I believe, states should not be able to deviate from regulations, particularly in a declining fishery and that it opens the door for more breeding class fish to be killed prior to completing their annual migrations.
7. Recreational Release Mortality: I recommend new strategic and sizable efforts towards the public education of Catch and Release fishing. I recommend using a variety of different geographic areas to obtain release mortality data to determine effects of specific geographic influences on ASB.
8. Recreational Accountability: I recommend removing this issue from Amendment 7
9. Commercial Allocation: I strongly recommend changing commercial allocations to reflect the characteristics of today's commercial ASB fishery.
10. Other Issue: Written below, is the most critical issue effecting the current declining ASB fishery:

    The decrease in ASB stocks available inshore, have caused increased ASB angling efforts offshore, often beyond the 3NM line. Specifically, those targeting the mega pods or biomass stocks of ASB over 30lbs off Block Island, North of Cape Cod, and off the South Shore of Long Island and New Jersey Waters. Since the Biomass is shrinking and the local or resident schools of large ASB have disappeared, it has caused a significant increase in angling effort in the EEZ. I highly recommend bold and laser focused changes be made, both legislatively, and financially, and increase law enforcement presence and effort specifically targeting illegal ASB fishing/possession in the EEZ. In addition I recommend designating the entire SW ledge area off Block Island a special ASB nursery and closed to fishing for ASB for 10 years.

Mark Phillips
25 Fieldstone Way
Westerly RI, 02891
(860) 462-2014

Comments

From: Chris Mayo <cmmsurfcaster@verizon.net>
Sent: Thursday, April 08, 2021 10:39 AM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern:

I am a lifelong recreational angler, who tries to be a good steward of the striped bass resource. By personal preference I rarely keep a fish, usually only if a passenger on my boat wants to keep one. I fish every single weekend, mostly catch and release flyfishing.

I fish mostly Boston area up through the north shore of Massachusetts. I have kept a log of my catches since 2003 to learn from my experiences and reflect upon what I have seen over the years. What I have witnessed is the following since 2012

1. I have seen year over year decline in fish caught by myself and my fishing partners
2. Shorter to non-existent fall runs
3. Less fish in the estuary systems of Plum island
4. Generally less surface activity on average during the entire season
5. For charter boats I have hired, average size of “keeper” bass going below 32”
6. Larger schools of menhaden (great) left alone by predator fish

I support all the positions of Stripers Forever, for all the reasons they promote that I am sure you already aware of.

My main point is, we have already been down the road of a population collapse of the 70’s and 80’s. Can we simply just remember and learn from our history? All your datapoints on the population are apparent and we all know about them. Why aren’t we immediately heading into moratorium type policies?

Chris Mayo
617 697 2268

Sent from Mail for Windows 10

Comments

From: Christi H <christiholmes87@gmail.com>
Sent: Thursday, April 08, 2021 10:25 AM
To: Comments
Subject: [External] Striped Bass PID

Hi Emilie,

Striped bass are a very important recreational fishery. I don't have a boat here in Maine, so striped bass are the only sport fish I can target from shore. They provide an excellent fishing opportunity for everyone, not just those with boats.

The striped bass fishery should focus on recreational anglers and an abundance of healthy fish, not focused on managing for harvest.

Thanks,
Christi Holmes
Maine

Comments

From: Jeff Bergeron <jlberg99@gmail.com>
Sent: Thursday, April 08, 2021 9:49 AM
To: Comments
Subject: [External] Striped Bass PID

Good Morning,

I wanted to state what I think of the current state of the Striped BAss fishery and what I see in the future. I am a surfcaster who enjoys the sport of hardcore surfacasting. In my 15 years of fishing for Striped Bass I have never kept a single fish. I fish for them responsibly and have no tail hooks on any of my equipment etc to ensure proper release with minimal impact.

I have witnessed over fishing in areas such as the Cape Cod Canal with smuggling of fish, keeping short fish, fish above the new slot limit etc.

I believe the only true way to save the stocks and let Striped Bass rebound is to prohibit keeping any Striped Bass regardless of size, weight or fishing method (including Commercial) for at least 5 years. In this 5 year period, fishing for Striped Bass whether commercial or pleasure should be strictly Catch & Release.

Also, Commercial striped bass fishing should remain closed in the Cape Cod Canal permanently.

Thank You
Jeff Bergeron
jlberg99@gmail.com

Comments

From: Robert Yagid <robert.yagid@gmail.com>
Sent: Thursday, April 08, 2021 9:31 AM
To: Comments
Cc: WILLIAM HYATT; Sen. Craig A. Miner; ROBERT LAFRANCE; Rep. Melissa Ziobron; Justin Davis
Subject: [External] Striped Bass Management: PID comments for Amendment 7

Dear members of the ASMFC Atlantic Striped Bass Management Board:

I want to take a moment and thank you for the opportunity to comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan for Atlantic striped bass.

I have spent my entire life fishing for stripers along the New England coast. It is a treasured pursuit within my family and our fishing traditions are passed down from fathers to sons and daughters, and from grandfathers to grandchildren. But, over the years I have seen the degradation of our fishery. I've seen opportunity diminish and the ensuing impacts they have had on regional communities and economies supported by these fish. So, I urge that you approach this process with the attention that it deserves, and that you establish guidelines and management practices that ensure an abundance of fish, with a broad and diverse age structure, in the water for future generations.

It has been declared that our stripers are overfished. Yet the board has failed to institute a rebuilding plan to ensure the health of the fishery. Members of the fishing and outdoor community demand accountability for those who are charged with the stewardship of striped bass.

With that said, I request that you make the following consideration for Amendment 7, which are in alignment with the recommendation of the American Saltwater Guides Association and the research and work they've done on this issue. They include:

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient and would like to see this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I request that 1995 be considered an appropriate reference year, and recommend that the biological reference points remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile

abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible. The failure to do so further erodes the credibility of the management board and the value they supposedly bring to the fisheries they oversee.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must absolutely be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. At this point in time I suppor the efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I also view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, I'm also recommending the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9—Commercial Allocation: I would like to see the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers.

Thank you for your time and for your work on this incredibly important issue. The Management Board has a real opportunity to demonstrate their ability to manage for abundance, in doing so they can restore the health of this important fishery and the credibility of the ASMFC.

Best,

Rob Yagid

Comments

From: Brendan Holden <bholden324@gmail.com>
Sent: Thursday, April 08, 2021 8:20 AM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern;

My name is Brendan Holden and I am from Massachusetts. I have been a avid surfcaster for the better part of 10 years now. Within those past 10 years the fishing has been good, to decent, and now seems to be steadily declining...

Most of my fishing areas include the Cape Cod Canal, Cape Cod Beaches, Southern Mass, and parts of Rhode Island. I have been happy with the progress of protecting the Striped Bass fishery in the past couple years but still believe more has to be done to help preserve these beautiful fish.

I strongly recommend closing the commercial striped bass fishery and keeping in place the slot limit of one fish per day at 28 to 35 inches for recreational fishing.

One day I hope to pass on my knowledge and passion for Striped Bass fishing to my daughters but fear I won't be able to if the proper corrective actions are not taken now.

Please feel free to contact me with any questions.

Thank you for your time and consideration,

Brendan Holden
40 Maolis Ave
West Bridgewater, Ma 02379
774-278-1649

Sent from my iPhone

Comments

From: Mike <mike@shadfishing.com>
Sent: Thursday, April 08, 2021 4:26 AM
To: Comments
Subject: [External] Striped Bass comments from James M Bailey


Amend 7 letter--MB

Comments

From: ray hamilton <rayhamilton@gmail.com>
Sent: Wednesday, April 07, 2021 10:23 PM
To: Comments
Cc: Jerry Audet; Jeff Yates - Trout Unlimited
Subject: [External] Comments to ASMFC

Dear Board or Committee Members,
I am a recreational fisherman. I am an environmentalist. I respect nature. I want to speak for the striped bass who's population needs proper management in order to recover and reach a meaningful level of sustainability. I personally do not kill striped bass. I fish with barbless hooks. I don't need to touch a fish in order to complete my goal to connect with a fish. But, I'm certainly not the average or even the median member of the saltwater fishing community.

Please, be extremely careful in the decisions you make as a supervising body concerning the management of the striped bass. You have an extremely important and god-like commission. Both commercial and recreational fishing need to be limited and supervised. Nobody wins in the long run if the population is decimated because of a short term financial need.

I will support the use of circle hooks or even limiting the use of live or natural bait. I would support not allowing the removal of a bass from the water to be weighed or measured or for a picture. Catch and release should be completed in less than a minute.

Do your job and please do it well with favoritism only for the striped bass you are directed to protect.

Focus and act responsibly,

Ray Hamilton
Stamford, CT

Sent from Mail for Windows 10

Comments

From: Taylor Ingraham <tayloringraham@tightlined.com>
Sent: Wednesday, April 07, 2021 9:56 PM
To: Comments
Subject: [External] Striped Bass PID

ASMFC Commissioners:

I appreciate the opportunity to submit comments regarding the Striped Bass Amendment 7 Public Information Document.

My name is Taylor Ingraham, and I have lived in CT my entire life. I have been fishing for striped bass for more than thirty years, ever since my dad took me fishing for them once I could walk.

More than three years ago, I founded the Tightlined Slam, a catch and release fly and light tackle tournament in the Western Long Island Sound dedicated to raising money and awareness for the conservation of our fisheries. Given the status of the striped bass fishery, our efforts have focused primarily on the management of striped bass. Subsequently, I founded the Tightlined Conservation Coalition, a non-profit organization with a mission to promote and accelerate efforts to conserve our fisheries and marine resources.

I've seen first-hand how the fishery has changed and declined over the past ten plus years and recognize the need for stronger management of the species, both for us and for future generations. I have twin three-year olds who love fish, and I want nothing more than for them to be able to enjoy as good of, or better, striped bass fishing than I have. For that to be possible, we must manage the species for abundance.

I want to start by saying that I believe this amendment process is ill-timed in light of the overfished status of the stock and due to the uncertainties around the effectiveness of the regulations implemented in Addendum 6 caused by the pandemic. Instead of this drawn out process, I believe the Commission should be focused on implementing a rebuilding plan, which should have been put in place as soon as the stock was determined to be overfished more than two years ago.

With that said, I'll run through the key issues outlined in the PID.

Goals and Objectives – the current goals and objectives of the Striped Bass FMP are adequate, and the stock should be managed for abundance with a broad age structure that supports a healthy fishery. I do not believe the issue with the fishery is the goals, but instead the AMSFC's failure to adhere to them. Accordingly, this should be removed from the amendment document.

Biological reference points – 1995 is an appropriate reference year, and the reference points should remain as is and be removed from the Amendment discussion. We have not adhered to regulations that allow for a healthy stock structure, and that is not a reason to lower the goalposts as to what determines a healthy or overfished fishery. Changing the reference points would effectively lower the number of striped bass in the water forever, which is not an acceptable outcome and not called for scientifically.

Stock Rebuilding Target and Schedule – We are already two years removed from the fishery being declared overfished, and there is no rebuilding plan in place. Initiating a plan to rebuild the stock, in accordance with the 10-year timeframe outlined in the existing bylaws, should be a high priority in this process. The longer we wait to rebuild the stock, the harder it will be. The 10-year timeframe should not be lengthened.

Regional Management – Until there is science to support or inform any type of regional management for striped bass, it should not be considered in Amendment 7. As we all know, striped bass migrate extensively, and should be managed as one stock until science suggests otherwise. Given the overfished status of the stock, this should not be included or discussed further in this Amendment process.

Conservation Equivalency – This has not worked historically, and has contributed to the decline in the striped bass population. Until the stock is rebuilt, we need strong, coast-wide regulations that are designed to rebuild the stock to the target levels. Accordingly, we should not allow any conservation equivalency measures until that takes place. Once the stock is rebuilt, any conservation equivalency regulations need to include measures to hold states that adopt CE accountable if they do not meet stated conservation objectives.

Recreational Release Mortality – this is not a new issue, and the number of dead discards has not changed dramatically in the past. That said, it is a big piece of the fisheries impact on the stock. To try and reduce release mortality, I support educational efforts coast-wide to promote proper catch and release and fish handling tactics.

Recreational Accountability – While I do support holding states and constituencies accountable for over harvest, this is a very complex issue that goes beyond striped bass. Accordingly, I do not believe it is an appropriate topic to include in Amendment 7.

Commercial Allocation – The current allocations are very much out of date, and I recommend that the Striped Bass Board work with the Technical Committee to update those allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery. The stock has collapsed, been rebuilt and declined again since those allocations were determined.

Change is clearly needed in the way striped bass are managed. The stock remains overfished, and rebuilding that stock back to target levels and managing the fishery for abundance needs to be the priority of the Commission through this process.

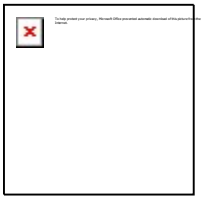
I listened into a number of public hearings, and I hope each of you heard the overwhelming support for more conservative management from anglers up and down the coast. This Amendment process is an opportunity to rebuild the stock and maintain a healthy and abundant fishery for years to come, and I hope you all work together to ensure that opportunity is not wasted and that these fish are managed appropriately for the next generation of anglers.

Thank you again for taking my comments, and I look forward to engaging again throughout this process.

Sincerely,

Taylor Ingraham

Taylor Ingraham



Comments

From: Anthony Poirier <aspoirier@gmail.com>
Sent: Wednesday, April 07, 2021 9:52 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern,

I, like most, want what's best for the fish. I put a fair amount of time and thought into writing this essay, so I hope you're in a patient mood.

When you have a health problem, do you solicit for input from your social media friends or do you go to the doctor? Soliciting for public comment on the future of striped bass management feels a bit like the former. I suppose the opinionated masses must be appeased. It seems to me that management of fisheries and all other renewable resources should be set by state and federal biologists alone. I appreciate the transparency of soliciting for public comment but the feedback, even mine, should be taken with a grain of salt. I don't believe that I'm qualified to weigh in on all of the issues in question. But since you asked...

1.Fishery Goals and Objectives - Flexibility to adapt to the striped bass population's needs is most important.

2.Biological Reference Points - should be determined by biologists not the public

3.Management Triggers - same as #2

4.Stock Rebuilding Targets and Schedule - If we're doing it right, this is about the fish, not the angler or economy. How hard can we hit this renewable resource before it goes the way of the passenger pigeon? There's been lots of species that, people thought would never go extinct until the biomass shrunk beyond repair. Can the biomass tolerate small incremental changes or does it need more drastic attention? I'm not a biologist, and I'm not afraid to say I don't know.

5.Regional Management - Regional management makes intuitive sense but implementation may be difficult/impossible. A more complex season/harvest limit may be an appropriate implementation. Hunting seasons and regulations are far more complicated than anything I've encountered in recreational fishing and those systems have proven effective to control harvest rate. I'm not sure exactly what this would look like for striped bass, maybe close harvests during spawning in areas it's known to happen? It might mean spilling the beans on some of the hidden gem fishing spots unless the closures are broad.

6.Management Program Equivalency (Conservation Equivalency) - no comment, I'm not knowledgeable in this area.

7.Recreational Release Mortality - If we truly loved these fish we'd stop fishing for them. It's an addiction in more ways than one. Seasonal closures might help and, I think, will give the least amount of public back-lash. How very hypocritical of me, though, because I selfishly want to continue to use treble hooks. Maybe limit to one treble hook and one in-line per lure? I remove tail hooks whenever possible but some plugs like darters typically need two to swim properly and a 9 inch Doc usually hooks up on the rear hook not the belly hook... No clear-cut one size fits all solution exists.

8.Recreational Accountability - do the biologists think a RHL is necessary? Or regional RHL's designed to target specific stocks? Complicated regs would be acceptable if it makes sense for the betterment of the fish.

9.Coastal Commercial Allocation - Establishing commercial (or recreational) harvest rate based on a period of years well in the past is shifting baseline syndrome in a nutshell and there must be a better way. It makes more sense to set it as a rolling percentage of the biomass of the previous 3 or 5 or 10 years, not based on how it 'used to be.'

I am a MA resident and am only intimately familiar with my state's commercial regulations, so I will only comment on my state's policy. Rec harvest is bound by slot, commercial is the top of the slot and up. Doesn't make sense, commercial harvest should also be bound to do what's best for the fish ie releasing the cows. Also, commercial fishing quota has not been filled in several years now so the state is considering adding extra fishing days to increase angler opportunity but what if there are just not enough fish to be caught? Again, I'm no biologist but it seems like the state is going about solving the problem from the wrong direction.

10. Other Issues - Is the increasing population of seals and sharks considered as part of recreational release mortality? Also relevant, my earlier comments about shifting baseline syndrome. I imagine these predators eager to jump on a very tired, just released bass. Unfortunately I think I'm proposing a problem without also providing a solution, but it seems relevant.

Thank you for your time,
Anthony

Comments

From: Germain Cloutier <stripedbassking@yahoo.com>
Sent: Wednesday, April 07, 2021 9:25 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,
My Name is Germain Cloutier. I am from the state of Maine and here are my Comments regarding Amendment 7 for Striped Bass:

Issue 1 Fishery Goals and Objectives:
The Goal of Having a broad age structure of fish in the stock and maintaining the Habitat is Crucial. I believe we should manage for Abundance and Stock Stability. Everyone wants a bigger and better striped bass fishery. Anything that will Protect the Big Spawning sized fish should be added in as a priority. The existing Goals are ok as long as the target is not being lowered.

Issue 2 Biological Reference Points:
The 1995 estimate of female SSB is still acceptable as a benchmark for determining stock status. I believe that it should stay that way. There should be NO interest in lowering the target by any percentage at this time. The Board should be looking to manage for Abundance to provide a broad age structure so the fishery can move forward. There is no reason at this time to change the BRP.

Issue 3 Management Triggers:
It is important to build the stock Quickly. This is where Bold action NEEDS to be taken. Listening to all the Public hearings it was very clear that people will do whatever it takes to get the Fishery back, including a Harvest moratorium for a few years just so there wouldn't be any fish legally taken out of the biomass. Looking at the numbers from some of ASMFC meeting it showed that approx 48% of fish die from release mortality(given that number may be inflated some) but this leaves the other approx 52% of Fish Mortality to Harvests. If we were to stop harvesting(commercial & recreational) all together there would be an approx 52% of Fish left in the water to continue to get the fishery back on track. A harvest moratorium would help get the fishery back at the Fastest Pace possible. Significant changes are needed and it's clear the Public wants them to be in favor of saving striped bass and in a quick manner.

Issue 5 Regional Management:
I believe that Striped Bass should be managed the same Coastwide and Not by region, due to the migratory nature of the species. I do believe that there should be an exception to the spawning grounds of Striped Bass. There should not be fishing allowed while striped bass are on their spawning grounds. This would ensure that no fish would be legally taken and these fish would be allowed to have productive spawning sessions.

Issue 6 Management Program Equivalency(conservation equivalency):
At this Time Conservation Equivalency should NOT be allowed. The Striped Bass fishery is deemed Overfished and Overfishing is occurring and CE is not acceptable at this time for any state. In the Past CE has been used to drive state agendas that end up slipping through the cracks by actually harvesting more fish.

Issue 7 Recreational Release Mortality:
Education is good for the public and Gear restrictions to help insure less Recreational Release Mortality would be favorable. But it does not make sense to Have Recreational Anglers fish bait with in-line circle Hooks and then Have Massachusetts Commercial fishermen be able to Fish Bait with treble hooks. There needs to be

consistency for gear restrictions across the board. Gaffing of striped bass should be banned Coastwide, it is unethical and I'm sure that many fish die afterwards. Spear fishing as well should be an illegal method of take for striped bass because of the slot limit it is too difficult to determine legal sized fish.

Issue 8 Recreational Accountability:
There were some comments during the public hearings that made some good points about a tagging system or something of that sort to Keep track of harvested fish. If anglers were looking to keep striped bass during the season they would get a tag when purchasing their license, much like a hunting tag. The Board should be focused more at managing for Abundance at this time and not be too focused on RHL, harvesting should be limited as much as possible and then focus on harvesting Numbers once the stock has rebounded.

Issue 9 Commercial Quota Allocation:
Commercial allocation should be considered, although it is primarily a recreational fishery, the Damage caused by Commercial harvest/Bycatch is still quite large. There should be NO reason to allow commercial fishing for the Larger breeding sized fish while the stock is Overfished and Overfishing is occurring. The 72-79 years being used for baseline is way outdated and should be changed. To be honest no one would miss the commercial fishery for striped bass. The best thing to do would be to put commercial fishing aside from the striped bass fishery. The second a dollar amount is put on a fish there is huge incentive for Poaching and people not reporting catches like what is going on in many states since there is such a lack of law enforcement.

Issue 10 Other Issues:
Public Comment Should be taken into consideration. In the past the overwhelming public comment has been brushed aside and states have driven their own agendas. The Public is speaking out now and and want more Conservation of Striped Bass and will do whatever it takes to get that. I believe the Board will/should take action to favor the Public's stance going forward.

I would like to see Striped Bass managed as a Gamefish. Striped Bass Abundance is what drives economic value. These fish are worth a lot more alive then in a commercial net. I would like to see stability. This fishery can't support being pushed to the brink every twenty years. There is no reason that the fishery can't be managed for Abundance and stay that way. A very quick way to rebuild stocks would be to implement a Harvest Moratorium Coastwide. This would get the numbers needed back faster then any other option. The Board should look into this option.

The Board should look to protect Striped Bass Forage as well. By Not allowing for unneeded increases in Menhaden quotas this will directly help striped bass. Herring have already been wiped out and there's NO reason to just move onto the next bait fish and try and wipe out Menhaden.
Poaching:
This is a massive issue that is happening in Every Single State. The amount of poaching going on is devastating. The Board needs to find a way to allow for more law enforcement and push much harder fines on poachers taking illegal fish. Too many times people are getting a slap on the wrist and just go and poach again. It's becoming just the price of doing business. As stated in many public Hearings, people want the poachers caught and penalized harder. If the Board can have states implement harsher penalties for Poaching that would be great.

Thank you for your time and for allowing the public comment.

Thank You,
Germain Cloutier

Sent from Yahoo Mail for iPhone

Comments

From: NGR ej6 <yayo1850@gmail.com>
Sent: Wednesday, April 07, 2021 8:19 PM
To: Comments
Subject: [External]

Please do something about the bass fishery I see alot of poachers and I call fish and game and they tell me they don't have the man power to get to these places hopefully something changes

Comments

From: Phillip Sheffield <bonefishmon@aol.com>
Sent: Wednesday, April 07, 2021 6:48 PM
To: Comments
Subject: [External] Striper Bass Public Comments.

Moratorium please. Stop pretending you are managing these fish for anything other than consumption. You lost your way in the mission statement. To protect and promote the health of the bass fishery. Back door commercial and charter boat interests also pretend this is an unlimited fishery. Don't it always seem to go, you don't know what you've got til it's gone. Next managers please. Protect our striped bass or a grassroots movement will push all Governors and Congressmen along the striped bass coast to have all of you removed from the commission! This has become a disaster!

Not the best regards,

Phillip F. Sheffield

Sent from my iPad

Comments

From: Thomas Falco <jennyecharters@gmail.com>
Sent: Wednesday, April 07, 2021 6:13 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 PID comment

Hello,

My name is Capt Tom Falco, owner/operator of Jenny E Charters. My 6-pack fishing charter operates primarily in Great South Bay and the inshore waters outside Fire Island Inlet on the south shore of Long Island, NY. I have fished these waters for over forty years now, and, like my friends and colleagues, I am very concerned about the status of the striped bass fishery.

I have read Amendment 7 to the Striped Bass Interstate Fishery Management Plan's Public Information Document (PID), and would like to have my opinion on record. Generally, **I want abundance of fish in all size ranges. I want the reasonable expectation of catching striped bass to be restored as quickly as possible.** Although I could comment on each issue in the PID, I'd rather focus attention to the ones I feel are most important:

- **Issue 2--Biological Reference Points**

I support the best available science and believe that **1995 is still the most appropriate reference year, and should not be changed.** This BRP has brought us to a good place before, and I think we should stick with it. Just because the Striped Bass Board has not taken steps to maintain a healthy striped bass stock is no reason to lower the standard. I would like to see this issue removed from further consideration in Amendment 7.

- **Issue 4--Stock Rebuilding and Target Schedule**

To me, this is a "no-brainer". **The 10 year rebuilding timeline that is currently specified in Amendment 6 should be maintained.** Any delay will result in more uncertainty in the rebuilding process, and we cannot afford that. My business relies on a healthy and stable stock.

- **Issue 6--Conservation Equivalency**

This issue is the one that makes me the most upset. Perhaps this idea looks good on paper somewhere in an office, but the reality is that CE has been used by states to skirt the rules and take more fish out of the water. **I would like to see CE eliminated, especially now as the striped bass fishery is overfished and is experiencing overfishing.** Furthermore, if CE is continued, **states that do decide to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.** We've seen this over and over again; CE allows states to do what they want with impunity.

Striped Bass is woven into the fabric of our culture here on the East Coast. I am disappointed and disheartened at the state of affairs concerning this iconic fish and I am equally troubled by ASMFC's seemingly lackluster attempts at managing this fishery. However, I am hopeful that we--recreational, commercial, for-hire, ASMFC-- can rebuild this stock now, using Amendment 7 as the platform.

We expect good things from the Striped Bass Board, and we will be watching.

Thank you for the time and consideration,
Capt. Tom Falco
Jenny E Charters, Inc
Long Island, NY

Comments

From: Joe Busk <jrbusk@gmail.com>
Sent: Wednesday, April 07, 2021 4:57 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

I am an Atlantic Striped Bass Fisherman of over 40 years who has experienced significant swings in the Atlantic Striped Bass population over the years.

I am extremely concerned about the significant decline in the overall reduction of the Atlantic Striped Bass population over the past decade, and particularly the recent declines in "Young of the Year" spawns. Significant policy/fishery management changes are needed to ensure the survival of this essential species. Any and all policy/fishery management changes must accomplish the following objectives:

- Ensure a healthy and abundant Long Term Atlantic Striped Bass Population
- Implementation of policies that maximize the Striped Bass population throughout all size ranges / Year Classes to ensure long term viability
- Utilization of 2006 Atlantic Striped Bass Population Benchmark Levels
- Severe curtailment of, or multi year moratoriums on Commercial harvests until fish stocks recover significantly
- Protection of wintering / spawning females throughout the Chesapeake Bay Region

This is our fishery, and it is in imminent danger. Bold and aggressive conservation measures are needed immediately to reverse the current trends, and the time for implementation of such measures in now.

Thank you for your efforts to address these issues.

Sincerely,

Joseph R. Busk III
Scituate, Massachusetts

Comments

From: David Slater <slatedj@gmail.com>
Sent: Wednesday, April 07, 2021 4:09 PM
To: Comments
Cc: Sarah.Peake@mahouse.gov; Dan Mckiernan; mailray@capecodfishermen.org; stripercomments@gmail.com
Subject: [External] Striper Public Comment

To Whom it May Concern,

I am writing to discuss the future of striped bass. As an elementary school educator, I am tasked with the essential job of promoting kindness, while helping students develop empathy, which is especially challenging due to our current socio-political climate. Educators do however, have an entry point; the environment. The current generation of students has a very different perspective on our environment. They were born into a world mired in the throes of climate change, over consumption, and plastic islands forming in our oceans. Children aged 9 and 10 are keenly aware of this and are already trying to improve the world they inhabit. While they try to restore the planet, we as adults do not respond in kind. When Covid first hit, I remember listening to an interview with a child psychologist regarding the challenge of getting teenagers to wear masks. The psychologist essentially stated that for years children have been asking for help with the environment and gun control legislation, but have been ignored or dismissed, so they felt no sense of urgency to help the older generation. That was difficult to hear, but I can also understand the children's frustration. We now have an opportunity to show young fisher-people that the older generations are willing to take action to save an important fishery. That is why I support a science based approach to restoring the striped bass fishery. The following items are essential in restoring the striped bass population:
- The Biological Reference Point must remain unchanged and that 1995 is an appropriate reference year.
-Trigger 5 may not be an appropriate indicator of species health, so it should be reviewed.
-Lures must be limited to a single treble hook and all hooks must be barbless.
-The ten year rebuilding timeline must be retained and enacted immediately.
-Conservation Equivalency should only be considered if the stock is healthy and not over fished.
-Ban gill nets.
-Close spawning grounds to all fishing.

Thank you for your time and assistance in addressing this vital issue.

Warmest regards,

David Slater

Comments

From: Jay harrison <jharrison.jbh@gmail.com>
Sent: Wednesday, April 07, 2021 3:23 PM
To: Comments
Cc: stripercomments@gmail.com; Emilie Franke; dan.mckiernan@mass.gov
Subject: [External] Striped Bass PID

Hello Emilie,

I am writing this letter to make comments on the Striped Bass PID, specifically a few items within the PID

1) Biological Reference Points

I don't think we should be shifting what we believe to be a healthy fishery and biomass objective.
If we continue to move the goalposts, we can still be achieving significant attainment of certain goals while not actually making any progress, even going backwards.
For this reason I would like to suggest that re-setting the reference point be removed from Amendment 7

2) Stock Rebuilding & Target Schedule
I think this should stay as it is at 10 years and not be adjusted, aside from trying to take action in rebuilding the stock as soon as possible; the longer we allow the population to decline the longer it will take for it to recover, if we don't get beyond a point of no return.
We need to act quickly and aggressively to get the stock into a healthier state - once we begin to make progress we should see compounding growth which would be very promising.

3) Conservation Equivalency
I think given the current state of the stock, we should not be looking to allow conservation equivalency as it's subjective as to whether that equivalency is actually achieved.
If we have multiple states with different agendas to help the stock, and the stock continues to drop it will be difficult (or more challenging than if we didn't use CE) to pinpoint the issues.
I think it is best for us to keep a standard operating procedure across the entire stock so as to have a better reading on how our actions impact the stock.

Overall I'd like to provide some insight as to what I would consider a healthy and ideal fishery. To put it simply, I would like for there to be an abundance of fish and an abundance of sizes of fish.
I have been fishing in CT & MA waters for much of my life now and the striped bass is the heart of my experience of fishing these waters; it would break my heart to have to explain these fish to my kids or even grandkids rather than show them.
I think recreational fishermen, guides, and commercial fishermen would all benefit greatly from a healthy stock and fishery - once the stock drops to dangerous levels it could be all over for everyone looking to interact with these fish.
I understand that it can be challenging with pressure from people whose livelihoods depend on catching and selling these bass (guides included), but in my opinion the reality of the supply and demand for these fish is that we cannot force additional demand to be realized without jeopardizing the future of the species.

I greatly appreciate the time and effort put forward to review and take into account the public's comments on these issues and I thank you for your service in helping our favorite fish to be sustainably enjoyed by all!

Best,
Jay Harrison

Comments

From: K.C. Boyle <kcboyle84@gmail.com>
Sent: Wednesday, April 07, 2021 2:53 PM
To: Comments
Cc: 2021striperPID@gmail.com
Subject: [External] Striped Bass PID

Dear ASMFC,

I'm writing to you to relay my support for responsible management of striped bass populations on the East Coast. In my opinion, responsible management within amendment 7 should center around supporting slot bass regulations for at least the next decade. I trust scientists know more about this subject than I do, and trust them to help this fish rebound as they've done in the past.

Best regards,
Kevin Boyle

--
K.C. Boyle
631-807-9555
KCBoyle84@Gmail.com

Comments

From: Robert Turnbull <turnbull@kroy.com>
Sent: Wednesday, April 07, 2021 1:58 PM
To: Comments
Subject: [External] Striped bass management

1) It should be recreational only - the value of recreational fishing far exceeds that of commercial striper fishing
2) One set of rules for the entire coast - me paying $6000 to spend a summer in Maine fishing for striper and allowed 1 a day, but other places are 5 - pick a number based on data and implement
3) Make it a game fish - it is and it would solve many issue
4) Close areas where breeding occurs during breeding season - to protect the large breeders and to increase population growth.
4) Goal should be long term best case - while maintaining the tourism that comes with the fishery - to me those are the only goals that count.
Thank you for what you do
Robert Turnbull

Comments

From: klarkgoros@gmail.com
Sent: Wednesday, April 07, 2021 1:29 PM
To: Comments
Cc: Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] Striped Bass PID

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board,

Thank you for providing an opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass.

My name is Klark Goro, and I am a 24 year-old recreational angler living on the North Fork of Long Island, New York. Saltwater fishing has been a part of my life for as long as I can remember. Though I've always enjoyed all types of fishing, my favorite fish to target was always striped bass. A large part of my childhood years coincided with the peak of striped bass fishing, and so despite my being relatively young, I remember what it was like to have a world class fishery. That is what we should be striving to achieve again, and that is the basis for my comments, which can be found below.

Issue 1: Fishery Goals and Objectives

I believe that the current goals and objectives of the FMP, as per Amendment 6, remain appropriate for the management of striped bass. Existing objectives balance the need for management stability, flexibility, and regulatory consistency, as they should be. Of these three themes, regulatory consistency is the most important by far. Given that striped bass are a migratory species, any regulations should apply coastwide with zero exceptions. As far as management stability and flexibility go, these would be achieved with a well-managed and thriving fishery. The reality is that the current state of the fishery is a direct result of the failure of the Board to follow the existing goals and objectives. Rather than attempting to alter the objectives, the Board should be looking at the decision-making that led to our current predicament. As such, I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2: Biological Reference Points

The 1995 estimate of female SSB is still an appropriate benchmark for determining stock status. The thought-process behind choosing 1995 as the basis for BRPs seems well-thought-out, and given the lack of model-based reference points, I see no reason to change it. One thing I would like to speak to is the sentence on page 7 of the PID: "Given the 2018 benchmark assessment found overfishing was occurring and the SSB was below the target even during those years that the striped bass population was at a historically high level, the current reference points may be unattainable given current objectives for fishery performance." To me, that result further validates the current BRPs. It means that despite the fishery being at its prime, there was still room for improvement. It also shows that the writing was on the wall for our current situation. Rather than looking at these new perspectives and thinking "let's lower our expectations", we should be looking at how our actions led to the decline of the fishery, and how we can avoid that again in the future. I recommend that the biological reference points remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3: Management Triggers

The four management triggers that relate to fishing mortality and SSB (Triggers 1-4) as per Amendment 6, remain suitable for achieving successful striped bass management. I do believe that Trigger 5 should be revisited due to its

random nature. One option would be to utilize a metric such a rolling average, to buffer annual variability. Additionally, this trigger should require stronger action by the Board due to the level of impact poor recruitment has on the fishery.

Issue 4: Stock Rebuilding Target and Schedule

I strongly believe that the existing 10-year rebuilding schedule, as per Amendment 6 should be maintained. Given the rebuilding timeline, I believe that action to rebuild should be taken within one year of overfishing/overfished determinations. Again, there are lessons to be learned from the past. If we allow issues to linger, the will cascade. Immediate action would counteract this risk.

Issue 5: Regional Management

Due to the lack of ready tools to support regional management, I believe that this issue should no longer be considered in Amendment 7. While I would support regional management if the science and tools can support it, right now our focus needs to be on recovering what we have. If we continue on this path, there will be no more fish to divide into regional stocks.

Issue 6: Management Program Equivalency (Conservation Equivalency)

In an ideal world, conservation equivalency (CE) sounds like a great concept, however, in reality it is nothing more than a legal loophole for states to abuse (i.e. New Jersey). Additionally, it inserts more uncertainty into the management process, which is undesirable even at the best of times. Because of this, I recommend that conservation equivalency should be removed from the Striped Bass FMP.

Issue 7: Recreational Release Mortality

While I would not be unconditionally opposed to a restriction such as only allowing one treble hook per lure, I believe that the primary focus should be on education and outreach. States should provide resources such as videos and/or documents that teach proper fish handling, and should mandate some sort of annual quiz to maintain a fishing license. I would even call for an annual fee to support such an effort, and I'm sure many other anglers would as well.

Issue 8: Recreational Accountability

While I understand that there are complexities associated with implementing a recreational harvest limit (RHL), I believe that we need to implement one. Although the new slot limit is now protecting the big breeding females, it is redirecting that pressure towards those newly mature fish. Given that we have a strong year-class that will be entering the slot within the near future, we need additional action to protect it, as that group would likely be the backbone of a stock rebuild. A tag system of some sort should suffice for this, with each angler being permitted one or two harvests annually. Moreover, I believe that we need to take a look at the regulations for charter/party boats. Despite the fact that they are a business, I would argue that their angling is recreational in nature, and should therefore be subject to recreational regulations. The reality is that they remove a lot of fish, because their goal is to put meat in the freezers of their customers. This needs to be limited somehow, because they can do this anywhere from two to four times a day, and it is not sustainable.

Issue 9: Coastal Commercial Quota Allocation

Given the nature of commercial harvest during the reference and the time elapsed, I recommend that the Board updates commercial allocations to better reflect today's fishery.

Issue 10: Other Issues

I believe that there needs to be more research done on various aspects of the fishery that include but are not limited to human influence, climate change, habitat degradation. Additionally, enforcement needs to improve a lot. I understand that it is very difficult to monitor the recreational angling, especially since a lot of it is done at night, but something needs to be done. More boots on the ground is a great first step. Again, if this were to come with additional fees to finance, I'm sure there would still be a tremendous amount of support.

Striped Bass are a pillar of the East coast, and we need to treat them as such. I implore the board to put the fish first, as without the fish in good health, there will be unspeakable economic loss.

Thank you once again for allowing us the opportunity to comment on the PID, and for your consideration of my comments.

Sincerely,

Klark Goro

Comments

From: John Ehrenfeld <johnehrenfeld@gmail.com>
Sent: Wednesday, April 07, 2021 1:30 PM
To: Comments
Subject: [External] Striped bass PID

24 Percy Road
Lexington, MA 02421
April 7, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Comments on Atlantic Striped Bass Amendment 7 Public Information Document (PID)

Dear Ms. Franke and Atlantic Striped Bass Management Board:
I am a recreational striped bass angler and writing to provide comments on Amendment 7. For the last 30 years, I have regularly fished for striped bass in Casco Bay, Maine, and, occasionally elsewhere along the Atlantic Coast. Recreational fishing for striped bass has been a constant feature in my life as I spend summers on Casco Bay. My wife, my daughter, her husband, and their three sons all fish for striped bass.

I am concerned that striped bass populations are decline, heading to depressed levels of the 1970s and 80s. Over the last ten years in fishing for striped bass, I have observed a significant decline in the fishery through my experience as a frequent angler. I now experience more days on the water with nary a fish in sight during what should be prime fishing conditions. Without immediate significant changes to improve spawning striped bass populations are made, I believe another moratorium on striped bass like the moratorium of the 1970/80s will be necessary.

Here are my responses to the specific issues listed in the "Atlantic Striped Bass PID Presentation March 2021." My comments are based on my desire to conserve, protect, and restore a healthy striped bass fishery now and for future generations.

Issue 1: Fishery Goals and Objectives:
The existing goal should at the very least, remain the same. Given declining stocks the language "consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock" should be adjusted to acknowledge the current declining stocks. I'd recommend inserting language that acknowledges a declining striped bass fishery. The objectives should also acknowledge the SSB declines and state that the current stocks are in jeopardy because of this. Language should reflect objectives to meet the SSB Target, not only the Threshold. I am not in favor of regulatory flexibility since I believe that such flexibility has contributed to the decline of the striped bass fishery over the past 15 years.

Issue 2. Biological Reference Points:
In the late 1990's, the fishery in Maine was very healthy. During those years, he fishery had recovered, based on conservation efforts and catch limits from the 1980s. The 1995 targets should be used as a measure of a healthy striped bass fishery.

Issue 3. Management Triggers and Issue 4. Stock Rebuilding Targets and Schedule:
Given the rapid decline of the fishery, a commercial fishing moratorium and a mandatory catch and release regulation for recreational anglers is necessary until the fishery recovers to 1995 levels. This would simplify any of the issues raised around management triggers and would rebuild the stocks as we have seen in the past.

However, if this is not an option, I support evaluating all triggers annually. If a region or circumstance exceeds a trigger, then there must be immediate consequences and corrective action taken for the following fishing season. I would also recommend accelerating the rebuilding timeline from 10 to 5 years and create a higher recruitment threshold. Rebuilding the stocks should be the AMSFC's number one priority and more stringent management would help.

Issue 5. Regional Management:
The most effective measure to restore the stock would be a commercial moratorium, and mandatory catch and release regulations for recreational anglers. If this is not possible, regional management policies should focus on stabilizing and rebuilding stocks.

Issue 6. Conservation Equivalency:
I support eliminating CE because there is too much uncertainty around Conservation Equivalency (CE). Currently, any states that implement CE must be held accountable if their regulations fail to meet the stated conservation objectives. A commercial moratorium and mandatory catch and release regulations for recreational anglers would eliminate the need for CE.

Issue 7. Recreational Release Mortality:
All actions that have the potential to reduce release mortality should be considered. In addition to the use of circle hooks, single barbless hooks could reduce striped bass mortality. Massachusetts and Rhode Island provide free online educational videos and tests for boaters. Similarly, anglers could watch a "safe fish" handling video prior to being issued a fishing license or take an online test to be granted a license.

Issue 8. Recreational Accountability:
Too much uncertainty exists around Recreational Harvest Limits (RHL), especially given the current decline in the fishery. However, in a catch and release only recreational fishery, meaningful education efforts as mentioned in Issue 7 above can go a long way to providing some accountability to recreational anglers in a catch and release only scheme.

Issue 9. Coastal Commercial Allocation:
If a commercial moratorium is not established, commercial quotas should be tightened to coordinate with all of the issues being considered in the recreational fishery. Restoring the health of the striped bass stock requires reducing the pressure on the fishery by eliminating or limiting harvest. Under current conditions, the Board should consider aligning recent requirements in the recreational fishery with the commercial fishery, for example, circle hook requirements and harvest size requirements.

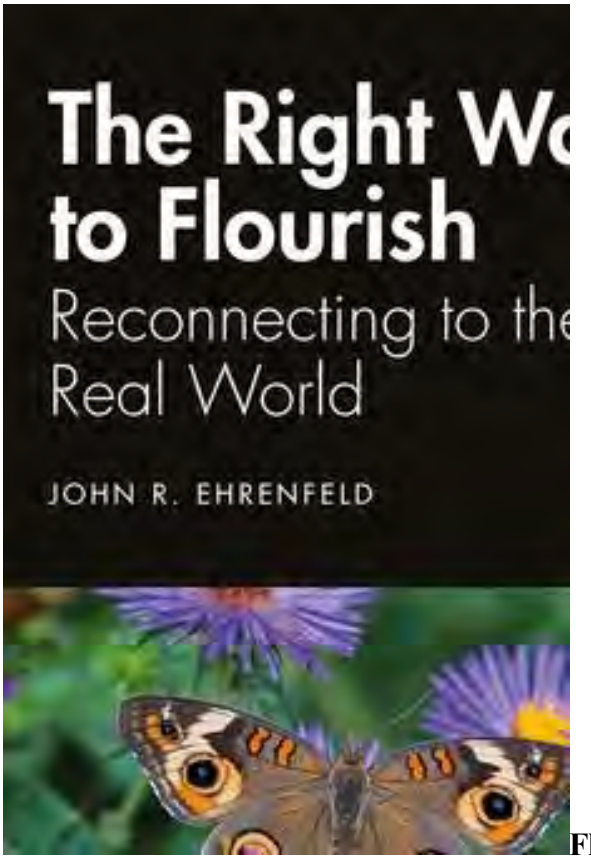
Issue 10. Any other topics that should be addressed in Amendment 7?

There is significant uncertainty from a lack of data and a time lag when data can be meaningfully analyzed to impact the health of the fishery. There is clearly a need for more science and data collection.

I appreciate the opportunity to provide comments.

Sincerely,
John R. Ehrenfeld

****



Flourishing, not sustainability, is the right vision for the future. Order my new book: *The Right Way to Flourish*: *Reconnecting with the Real World* . Visit my website.

John R. Ehrenfeld 24 Percy Road, Lexington, MA 02421 (781) 861-0363

Comments

From: RomanAround5246 <romanaround5246@gmail.com>
Sent: Wednesday, April 07, 2021 1:28 PM
To: Comments
Subject: [External] Striped Bass PID

Hi Emilie,

My name is Roman Dudus from Waterford, Connecticut and I am emailing you to voice my opinions on the Striped Bass Amendment 7 issue. I made some comments during the Connecticut meeting but didn't want to take up too much time and only brought up the important things at the time.

On issue one, I believe that Ammendment 6 is still reasonable and obtainable. We should reach SSB target and not just shoot for the threshold. Rebuilding should be a priority and then better management regulations need to be put in place so we do not have the same issue reoccur.

On issue two, we should continue to use the SSB from 1995. This number is appropriate still attainable. Overfishing that is occurring in states should be address and actions need to be taken. Fishing numbers should not be transferred from state to state.

On issue three, I believe in the management triggers in effect now. I do believe that all these triggers need to be evaluated annually and if any triggers are met, there needs to be consequences met with strict enforcement starting the following year. There should be a priority set on monitoring the situation more closer.

On issue four, a priority needs to be put on stock rebuilding. I think that the ten year window is too long. This fishery is too important to have that big of a window. I would settle with five years but I even think this is too long. Things like a closed winter season from about December 15th thru April 15th isn't unreasonable especially thru the rebuilding phase.

On issue five, the same regulations need to be coast wide until the stock meets the SSB 1995 Target and not threshold. And only then can we start thinking about regional management. The fish travel up and down the east coast and not just regionally. Every state needs to do their part in this matter.

On issue six, again I am against Conservational Equivalency. There is no true way to determine the specific numbers tied into this. It is just a guest. Like I mentioned earlier, when we hit the SSB 1995 Target, then and only then can we even start to think about Conservation Equivalency.

On issue seven, there is a high degree of recreational mortality. There is no quick fix or simple solution to this one. Education is a start but isn't the answer to everything. For example, how does one properly release a fish when one is on a jetty without a safe rock to rock a fish back and forth to get water thru their gills? Or a boat with high sides? Or really cold temperatures for both the water and air? How about plug manufacturers with treble hooks? Pamphlets and suggestions should be handed out with every license and tackle purchased. More emphasis should be place on dehooking devices and the proper way to use them. Maybe we can get manufacturers to come up with better ones for different applications like jetties or high sided boats. In all the hearing that I listened to, no one has brought that up. I think there needs to be a better way to do surveys dealing with catch and release. I am a Volunteer Angler Survey participant in the state of Connecticut. We have both a

computer version and logbook version. I don't mind filling these out because I understand what it does. There should be a push to get more people do it. Maybe then we can get some real numbers. The last thing would be to give the Striped Bass a game fish status.

Thank you for giving me the opportunity to voice my opinion. And Thank You to Emilie and the rest of the staff for having to deal with people who feel passionately about this issue. They did a great job dealing with everyone. I hope there is an answer for this problem because Striped Bass is one of those highly sought after species in the water.

Sincerely,

Roman Dudus

Sent via the Samsung Galaxy, an AT&T 4G LTE smartphone

Comments

From: Alan Rosenfeld <alanrosenfeld@semediagroup.com>
Sent: Wednesday, April 07, 2021 12:26 PM
To: Comments
Cc: stripercomments@gmail.com; Emerson Hasbrouck; Maureen Davidson; Sen. TODD KAMINSKY; James Gilmore
Subject: [External] Stripped Bass PID (Stripped Bass fishery)

My comments on the current Stripped Bass fishery.

My name is Alan Rosenfeld. I am a Florida resident but have a home in Wainscott, NY in the Hamptons. I have been fishing since I was five years old but first fished for Stripped Bass on the east end of Long Island in 2004. Back then I fished from June until the end of October. In the spring and summer I caught many Bass on clams in the surf and in the fall, experienced daily "blitzes" around Montauk and then along the beaches in the Hamptons as the fish moved south. For 2004 and 2005, we caught hundreds of Bass. Often 50 or more in the fall from shore per session on lures. Because of family, I missed all the fall runs after 2005 until I bought my house here in 2014. I did fish June, July and August on the beach with clams in those years but probably caught the last Bass in 2010. After 2010, all I would get would be sea Robins and Skate. Sadly, the last two Bass I caught in 2010 in June were 32 and 42 pounds! I kept the first one and released the second. When I bought the house, I also went out and purchased all the fishing equipment I always wanted but did not understand why the fish were not there. Especially in the fall. We caught some fish but it was nothing like I remembered. I ran into some of the old timers I had fished with and they just laughed and said those days we had were long gone. In 2016 I bought a boat and did a lot of fishing around Orient, Ruins and Montauk. Same thing. Not many striped Bass and virtually no blitzes like I remembered. This fall was the first time in years that I saw regular blitzes in Montauk but most of the fish were small.
I am happy that something has been done by creating the slot limit but we all hope with this, that the slot is not decimated this season as many of those fish (from the 2015 year) grow into the slot.
I do know the Bass were almost wiped out years ago but were successfully brought back. I love to eat many of the different fish I catch and while Striped Bass may be my favorite, I have no problem releasing fish if it helps improve the stock. I am on board with any regulations that would improve things because the fishery is not good. Just do something so we do not lose them all like before.
Thank you,
Alan Rosenfeld
Wainscott, NY

SOUTHEAST MEDIAGROUP

www.southeastmediagroup.com

Alan Rosenfeld
P.O. Box 402505
Miami Beach, FL 33140
Telephone 305-807-5801

alanrosenfeld@semediagroup.com

Comments

From: Eric Spicer <espicer13@gmail.com>
Sent: Wednesday, April 07, 2021 11:49 AM
To: Comments; KURT BLANCHARD; Jason E. Mcnamee
Subject: [External] Striped Bass Ammendment 7 Comment

To ASMFC, Mr. Blanchard, and Mr. McNamee,

Striped Bass are at risk. Everyone stakeholder from fishermen to policy maker knows this. It is heartening to see action being taken by stakeholders and policy makers to ensure this fishery stays around, but more can be done and resources can be spent more wisely.

One of the issues that can be addressed and easily supported is commercial catch limits. The data used for those limits is woefully out of date. This serves neither the striped bass population or the commercial fishermen who depend on a healthy fishery for their livelihood. The knowledge of the fishery is improved upon year after year as technology and public participation increases. Commercial limits should be adjusted based on the best available knowledge not a dated historical basis.

This brings me to my next comment. The ten year rebuilding timeline should be continued. As the ability to accurately assess stock improves through technique and technology it will help to make a more accurate picture of the species. An example of this is the two stock SCAA model. Improvements are happening and we should take advantage of these advancements over the next decade to get an accurate picture.

Thank you for taking the time to read my comments and thank you for being part of the solution to the striped bass issue.

Eric Spicer

Comments

From: Madruga, Bart <Bart.Madruga@parsons.com>
Sent: Wednesday, April 07, 2021 11:06 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] RE: My Comments to the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass

Pardon me but I clicked the wrong button:

Issue 2: Biological Reference Points

I do support the science even though it can be hard to understand.
I was not involved with saltwater fishing 1995, since I was busy raising a family but if
Those in the know suggest using 1995 as a reference point, then I will support it.

Issue 3: Management Triggers

Some type of rolling average should be used.
If we are set on a ten year rebuilding plan then we should use an even number rolling average that would be easier to integrate into this ten year plan.

Issue 4: Stock Rebuilding Target and Schedule

I support the idea of a ten year rebuilding plan.

Issue 5: Regional Management

So type of regional management plan should be adopted, but my lack of experience prevents me from suggesting how this should be done.

Issue 6: Management Program Equivalency (Conservation Equivalency)

I support the idea of CE even though other areas (states) abuse this.
A uniform program should be established so that all areas (states) are adhering to the same rules and guidelines.

Issue 7: Recreational Release Mortality

I strongly support catch and release, and the education of the public on how this is safely achieved.

Issue 8: Recreational Accountability

I support Recreational accountability, however it should be constant between all areas (states).

Issue 9: Commercial Allocation

I believe that Commercial Allocation needs updating and that the allocation should be revisited every year.

Issue 10: Other Issues
I have no comment to this as the subject is too broad.

From: Madruga, Bart
Sent: Wednesday, April 07, 2021 10:39 AM
To: comments@asmfc.org
Cc: stripercomments@gmail.com
Subject: My Comments to the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass

Issue 1: Goals and Objectives:
I do agree with these goals and objectives, but are they really tracked and enforced.

Bart Madruga
Supervising Instrumentation and Controls Engineer
PARSONS
Tel: 617-449-1177
Fax: 617-946-9777
Cell: 617-780-5327
e-mail: bart.madruga@parsons.com
Safety - Make it Personal

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Comments

From: Brian Killen <brian.killen@yahoo.com>
Sent: Wednesday, April 07, 2021 10:55 AM
To: Comments
Subject: [External] Save the Striped Bass!

Hello,

My name is Brian Killen and I am a member of the North Fork Anglers fishing club. I live in Cutchogue, NY and I'm going to keep this brief. We NEED to save his species for generations to come! If we don't act now we will continue to harm the striped bass population. Limit the regulations, we need another moratorium to keep this fishery alive. Please consider anything possible to save this species so that one day my daughter can fish recreationally for the fish that we all love.

Thank you,

Brian Killen

Comments

From: Madruga, Bart <Bart.Madruga@parsons.com>
Sent: Wednesday, April 07, 2021 10:39 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] My Comments to the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass

Issue 1: Goals and Objectives:

I do agree with these goals and objectives, but are they really tracked and enforced.

Bart Madruga
Supervising Instrumentation and Controls Engineer
PARSONS
Tel: 617-449-1177
Fax: 617-946-9777
Cell: 617-780-5327
e-mail: bart.madruga@parsons.com
Safety - Make it Personal

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Comments

From: Steve Winters <swinters41059@me.com>
Sent: Wednesday, April 07, 2021 6:06 AM
To: Comments
Subject: [External] Striped Bass

Dear Sirs, I have actively fished for Stripers since I was 10 years old. I have lived on Block Island since 1982 and have fished commercially and have also guided for Ocean and Ponds , the Orvis store previously on Block. I will be 62 and have witnessed many changes in the state of this fishery. I support most actions to protect and conserve these great fish. I would support a total moratorium again if other states follow the lead. I personally find small fish abundant at times and they need to be protected as they are our future. I hurts to see the pounding these fish are taking at Southwest Ledge year after year from RI,NY,Ct,and Ma boats. This staging area should be protected from the carnage. Thank you for accepting my comments and trying to make a difference for the sake of these fish. Steve Winters P.O. Box 41 Block Island RI

Sent from my iPad

Comments

From: jawdoc703@aol.com
Sent: Tuesday, April 06, 2021 5:01 PM
To: Comments
Cc: Stripercomments@gmail.com
Subject: [External] Striped Bass

Dear Sir/ Madam,

According to the scientific data, the Striped Bass species had and excellent spawning year in 2015. The two years preceding 2015, and the years since 2015 have had poor spawning success. That 2015 class will be 6 years old this summer. They will be entering the 28" range in size, and will be 28-35 inches in size for the next few years.
I know that spawning rates have a lot to do with the environmental conditions of the spawning grounds, but it is imperative that this 2015 class be managed and protected so there will be sufficient numbers of mature Striped Bass available to spawn when those spawning area conditions are favorable for a productive spawn.
If we don't have a decent spawn in the next few years, the future of the Striped Bass fishery will be in danger of collapse because other than the 2015 year class, the number of mature fish available to spawn is very low from several years of low birth rates.
My vision of the future is an abundance of Striped Bass of many different sizes in our waters. In order to accomplish this, the commission needs to manage the Striped Bass stock, not the fishermen. The fishermen know the SB stock is in trouble and realize some management of the fishery is needed in order to rebuild it. Managing and protecting that 2015 year class, and allowing them a chance to breed over the next few years is a good place to start.

Sincerely,

Richard J. Haskell

Comments

From: William Klenk <wfk858@hotmail.com>
Sent: Tuesday, April 06, 2021 4:42 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC,
I fish the south shore beaches in Nassau county, NY.During the 2020 season I caught about 75 striped bassand only one was a keeper at 29 inches (none were over slot size).It is my feeling that the striped bass fishery is over-fished.I pray that ASMFC plans are effective in recovering this fishery.

Sincerely,

Will Klenk
516-921-0594 (H)
617-620-0968 (C)

Comments

From: Keith Ritchie <keithritchie@me.com>
Sent: Tuesday, April 06, 2021 4:05 PM
To: Comments; Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White
Subject: [External] Stripe Bass Public Comment

To Whom it May Concern: I would like to take this opportunity to comment briefly regarding the proposed Interstate Fishery Management Plan for Atlantic Stripe Bass. It is abundantly clear that the stripe bass fishery is in serious trouble. Those involved with State and Federal management of this important resource must act quickly and decisively to improve the fish population. As a recreational fisherman I have witnessed first hand the decline in stripe bass populations in my home waters on Cape Cod. Massachusetts has attempted to gain some control over the declining population through reduction in catch limits and slot sizing. However the commercial season in 2020 was extended greatly due to the quota not being met. This fact alone should raise a red flag regarding the stripe bass population. I support the comments presented by the American Saltwater Guides Association as a reasonable step towards protecting this valuable resource. I am very concerned that if prudent conservation measures are not adopted soon, we may see a return to the near decimation of the fishery that occurred in the 1970's-1980's. I urge all involved with fishery management to recognize the clear warning signs of an important species in trouble. Thank you for your consideration.

Sincerely

Keith B. Ritchie
76 Pleasant Street
South Yarmouth, MA. 02664

Comments

From: Patrick Rudman <patrick@oldmaineoutfitters.com>

Sent: Tuesday, April 06, 2021 2:43 PM
To: Comments
Cc: Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 PID Comments

To Whom It May Concern,

Thank you for allowing me the opportunity to comment on the Amendment 7 Striped Bass PID. As a small business owner in Maine whose business is based around fishing for striped bass and protecting these fish, I am very passionate about seeing this stock rebound fully, and I greatly appreciate the thought and transparency that went into this document. My comments/feedback are as follows:

1. **Goals and Objectives:** The goals and objectives outline in Amendment 6 are still valid and need to be followed. Now is not the time to make any changes to these and we certainly should not be adding any "flexibility" to the management process when striped bass are at a 25 year low. Instead, the ASMFC needs to follow through on the goals and objectives that they outlined and agreed upon. Just because things get hard, doesn't mean you quit. With that, I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

2. **Biological Reference Points:** I believe that the 1995 baseline is the appropriate reference year as there is no science to support otherwise at this time. I would like the reference points to remain unchanged. Again, the ASMFC needs to hold themselves accountable here. Just because you have failed thus far to manage this stock accordingly, doesn't mean you can't change, and doesn't mean you get to make it easier. Lowering the goalpost will set a very dangerous precedent here that could affect the biomass levels indefinitely. With that, I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

3. **Management Triggers:** I believe that Triggers 1-4 that have been outlined in Amendment 6 are suitable moving forward for striped bass management.

4. **Stock Rebuilding Target and Schedule:** I want to see the stock rebound as quickly as possible. I, and I believe most of the public, have no confidence in the ASMFC's ability to manage a series of small changes over time given its added complexities. Action needs to be bold and taken immediately and that the 10-year rebuilding timeline outlined in Amendment 6 should be maintained.

5. **Regional Management:** The ASMFC is having a hard enough time managing one stock and the complexities around trying to manage two stocks for abundance would be astronomical if not impossible at this time given the lack of science. I believe they are only one stock and should be managed as such. I also recommend that this issue be removed from further consideration for inclusion in Amendment 7.

6. **Conservation Equivalency:** In theory, CE makes sense. However, we do not have the science to support decisions and there is no accountability when decisions not based on science fails. It is clear that States like Maryland and Delaware have used conservation equivalency as a loophole to kill more fish and I believe this has become a stain on the ASMFCs record. This is the opportunity to make things right. I recommend that CE ONLY be accepted when the stock is not determined to be overfished or when overfishing is occurring. I recommend that CE proposals ONLY be accepted with sufficient scientific data that support such proposals. And lastly, I recommend that any state that exceeds the catch limit through CE be held accountable with reduced harvest to make up for any overage.

7. **Recreational Release Mortality**: This is certainly something that needs to be evaluated and addressed. However, due to the lack of data, and given the ongoing Massachusetts DMF study assessing the impacts certain methods and tackle have on striped bass release mortality, I do not think it is the appropriate time to make any regulations. I do however believe that people need to be made aware of appropriate angler best practices when releasing fish and think states should focus more attention there.

8. **Recreational Accountability:** Again, this is a big one and certainly something that needs to be evaluated and addressed. However, given the complexities around this issue, I don't believe it should be tackled in the Amendment 7 process. With that, I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

9. **Commercial Allocation:** I am not a commercial fisherman and have no issues with commercial fishing for striped bass. That said, I believe there are serious issues with the 50-year-old commercial allocations landing period and that these numbers should be revisited. Additionally, we have a big problem with all these different groups of anglers targeting every possible striped bass size class. MD harvests the schoolies, the rec angler harvests the slots, and commercial harvests 35"+. This should be standardized, and I would recommend that commercial fish follows the standard slot limit - or whatever size regulation is established coastwide. I would also like to see commercial fishing move to a hook and line requirement as bycatch from gillnets/etc can destroy populations. I would also recommend the commercial quotes be greatly reduced when the stock is overfished and overfishing is occurring. This is something I would recommend for rec anglers as well.

10. **Other Issues:** I support the ASGA's efforts and would like to see an expansion of human dimensions research in the striped bass fishery as well as better research to help understand the relative contributions of individual striped bass spawning stocks to the overall coastal population. I would also like to see more angler education programs/funding.

Thank you very much for your time. The ASMFC has a golden opportunity to right the ship and save striped bass for future generations to come. Please do not let this opportunity go to waste. You must restore the faith of the public and prove that the ASMFC is capable of appropriately managing this stock.

Very Best,
Patrick Rudman
Old Maine Outfitters LLC - Owner
South Portland, ME
207-831-2617

Comments

From: Dr Tim Reichheld <drtim@straightteeth.com>
Sent: Tuesday, April 06, 2021 2:20 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane
Subject: [External] Striped Bass PID-Comments

Dear Atlantic State Marine Fisheries Commission and Board Members,

Please accept the following comments, numbered in relation to the issues presented, in regards to the Striped Bass PID:

1) These are excellent objectives. The three themes I value most are providing long term abundance of striped bass population, re-establishment of fish 15lbs or larger through decreased morality and increased rate of spawning at or above the target biomass level.
2) Yes, the 1995 target is still an appropriate benchmark. It was at that time the fishery was declared recovered and should be what we strive for going forward. Just because we can't "make a basket" doesn't mean we should "lower the hoop." We should continue to get better. It is a great threshold to aspire to attain and is doable with appropriate management.
3) These triggers are still valid. Trigger #5 should have a set timeline for determining appropriate management action as this is indicative of a serious problem and a specific, actionable outcome with a timeline, instead of just "review and determine appropriate management action" is needed to be defined.
4) The 10 year rebuilding timeline should not be changed. Neither should the specified yearly adjustments based on most recent data. Rebuilding should be started as soon as possible based on previous guidelines and rebuilding quickly to help these fish is more important than the impact to fisheries themselves in order to preserve this resource
5) If the science is good, "peer-reviewed," published and solid research then this may make sense. If the data is not as good then this is not a viable solution and coastwide management should be implemented, especially since this is a mostly migratory species and would therefore be very difficult to regulate.
6) Conservation equivalency should be removed from the PID. It will inhibit the rebuilding process by allowing states to set their own goals. This will make management of the fishery more difficult. States that do pursue CE must be held accountable to the goals set forth by the commission.
7) Release mortality is a huge factor in rebuilding the striped bass population. More education should be given to anglers to promote their understanding of the issue. Less use of treble hooks and using barbless hooks when targeting smaller fish should be recommended.
8) Yes, the board should manage the recreational fishery harvest more closely. Potentially the use of "tags" for fish should be used such as in hunting to accurately measure recreational harvest year to year. States that implement conservation equivalency need to be held responsible for these numbers, especially.
9) The most recent data should be used with scientists and regulatory officials to determine commercial quota
10) Impacts due to climate change and habitat degradation are essential to understanding the future of these populations. More research to spawning of these fish and use of accurate and unbiased scientific data based on literature and peer reviewed analysis in future policies is of critical importance.

This fishery is an important part of our ecosystem and economy. Your decisions on these matters will echo for years. Please don't be short sighted and do everything you can to make sure these fish are abundant and viable for future generations.

Sincerely,
Timothy L. Reichheld, DMD



Comments

From: Robert Yacoub <ryacoub88@gmail.com>
Sent: Tuesday, April 06, 2021 1:27 PM
To: Comments
Subject: [External] Striped bass management

What's the question? Of course there should be a moratorium. Why would we not protect a species in trouble to the utmost of our abilities, especially one so beloved as the striped bass? I know practically nothing about the commercial fishing aspect of striped bass conservation, but if that also needs to be shut down or curtailed, then so be it. I don't know know how many people make a living at it or how much is caught commercially as a percentage of total catch mortality. But as a consumer there are certainly more sustainable fish to eat. If it helps, my fishing buddy and I have spent an embarrassing amount of money on fishing tackle mainly to catch striped bass, and I'm sure we're not alone. What's the alternative, that the population crashes further? It cannot recover on its own. Isn't it that simple, even from the self-interested perspective of fisherman of any kind? I want as much as possible to be done to increase the striped bass population as much as possible. They, like every other creature, have enormous challenges to their survival. Let us add to that as little as possible. Let science be the guide. My two cents.
-Robert Yacoub, novice surf fisherman

Sent from my iPhone

Comments

From: Ben Johnson <johnsonben180@gmail.com>
Sent: Tuesday, April 06, 2021 12:40 PM
To: Comments
Subject: [External] Striped Bass PID

Hi,
I've lived in New England my entire life and have been striper fishing for longer than I can remember. I would like for my children and grandchildren to enjoy the same fishery that I have grown up fishing.

I do not think that the slot limit was enough of a help to the striped bass population, and instead, I think the fishery could use two or three seasons of catch and release only, to allow the population to recover.

In doing so, I believe this would not only help the striped bass population, but the bluefish population as well.

Thanks, Ben Johnson

Comments

From: Wesley Phillips <wesley.branch89@gmail.com>

Sent: Tuesday, April 06, 2021 12:31 PM
To: Comments
Cc: stripercomments@gmail.com; James Gilmore; Sen. TODD KAMINSKY; Maureen Davidson
Subject: [External] My Public Comments for Consideration, Atlantic Striped Bass Management Board Amendment 7

Emilie,

The ultimate question for me as a participant in the fishery is what do I want the fishery to look like. The answer is clear. I want the Striped Bass fishery to have a robust population of fish with a diversity in size. I want access to them as a recreational resource and a culture that treats the fishery with respect. Additionally, in the future I would like to be a part of the fishing industry and to do so requires that industry to be healthy. Abundance of fish is not just an opportunity for infinite enjoyment in a recreational sense but also provides an opportunity for those of us who seek to stake our livelihood and this amazing and priceless resource!

Issue 1) Fisheries Goals and Objectives

-Why should the goals and objectives be revisited? It is my belief, based on the data and evidence presented, that the goals and objectives are not the problem and that this issue should be removed from further consideration.

Issue 2) Biological Reference Points

- Please keep BRPs the same and remove this issue from consideration!

Issue 3) Management Triggers

-The triggers continue to be relevant with attention given to trigger 5.

-Trigger 5 dictates that, should there be 3 consecutive recruitment classes whose juvenile abundance index is less than 75%, overfishing is occurring. A single good recruitment class that breaks a poor streak of recruitment classes should not be an indicator of healthy fishery, this issue should be revisited.

Issue 4) Stock Rebuilding Targets and Schedule

-The 10 year rebuilding plan MUST remain in place!

Issue 5) Regional Management

-Remove this issue from consideration, that data is not available and not supportive of regional specific management

Issue 6) Management Program Equivalency

-CE should only be utilized in the case that overfishing is not occuring.

-Not all conservation requivilancy is equal and there MUST be consequences to those managers who do not meet the requirements.

Issue 7) Recreational Release Mortality

-There is currently a study being conducted by Mass Division of Marine Fisheries making action on this issue premature.
-HOWEVER, there should be action taken to increase efforts to continue to reach out and educate recreational anglers on the best practices for catch and release fishing.

Issue 8) Recreational Accountability

-Remove this issue for consideration except where it applies to CE in Issue 6.

Issue 9) Coastal Commercial Allocation

-The Striped Bass Board should work with the Technical Committee to update commercial allocations in a way that better reflects the characteristics of today's commercial striped bass fishery.

All of these views are sincerely reflective of my stance as an angler participating in this fishery and I thank you for taking the time to hear them.

Sincerely,

Wesley Phillips

Comments

From: Billy D <pbadad300@aol.com>
Sent: Tuesday, April 06, 2021 12:22 PM
To: Comments
Cc: Stripercommunity@gmail.com
Subject: [External] Striped Bass PID

Emilie Franke

As a long time Surf fisherman fishing for Striped Bass in Connecticut , Rhode Island and Massachusetts, I have witnessed over the last decade and a half the decline of fishing catches . My fellow surf club members of the CT Surfcasters Association in which I have held position of President during the decline, have also experienced the same results. We see a decline of all sizes especially of trophy sizes. Recent YOY numbers have brought an even bleaker outlook on the future of a viable Striped Bass population. We need to bring back the fish numbers from before 2006 where there was plenty of fish to be caught, big or small. Please consider the future of our current and future young Striped Bass fisherman when deciding what's best for the Striped Bass fishery when making the decisions for stock rebuilding.

Regards, Bill DeLizio Connecticut Surfcasters Association

Comments

From: G2W2
Sent: Tuesday, April 06, 2021 11:01 AM
To: Comments
Subject: FW: [External] Concern about the fishery

From: Johnny Delgado [mailto:johndelgado1189@gmail.com]
Sent: Tuesday, April 6, 2021 10:58 AM
To: G2W2 <G2W2@asmfc.org>
Subject: [External] Concern about the fishery

Good morning

I would like to voice my concern about the current fishery and strongly believe something needs to be done. I think there should be a mandatory educational video on how to handle fish to reduce mortality after the fish has been released and to stress the importance of catch limits . I also believe there should be more law enforcement checking catch limits on both charters and recreational anglers as I've witnessed both taking illegal catches.
I would like to one day witness a striper blitz where you can "walk on the fish" and it not be a video or picture of the "good ol days".

Thank you

Johnny Delgado

Bronx NY

Comments

From: Alberto <alberto.pina@gmail.com>
Sent: Tuesday, April 06, 2021 10:32 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Stripes bass PID

Dear ASMFC representatives,

The striper population is in serious decline and you should take urgent actions to stop the downfall. I think that you should declare striped bass a game fish and institute a catch and release across the board and along the striper coast in the northeast. Thank you.

Sincerely,

Alberto Pina
Forcv.com

Comments

From: David Mahoney <david.mahoney.65@gmail.com>
Sent: Tuesday, April 06, 2021 9:15 AM
To: Comments
Subject: [External] Stripped Bass PID

Greetings,
As a novice surfcaster, I was shocked by the number of anglers I see on the shore and lack of environmental police. I understand that they are short staffed and can't be everywhere, however their presence alone is welcomed by the majority and may push out the minority who aren't playing by the rules.

Some of the local tackle shops in my area (cape cod) are also selling, or advertising illegal hooks for stripped bass. Again the people playing by the rules know not to buy them but the weekend warriors who visit our waters could potentially harming the fishery without even knowing it. I would love to see hooks advertised properly, (circle hooks are for these fish, mustard hooks for those fish).

More enforcement and note education, thank you for the time.

Respectfully

Comments

From: eric henderson <ehenderson456@yahoo.com>
Sent: Tuesday, April 06, 2021 9:07 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Save Striped Bass

Good morning,

As an avid Striped Bass fisherman who has admittedly caught and kept many fish over the years, I would 100% support Striped bass becoming a game fish, where it would be illegal to keep them. The enjoyment of catching these fish and actually having fish to catch is a much greater benefit than the ability to eat them. The beauty of Stripers' is that they enter shallow waters and are accessible to fishermen and women without access to boats. They are different than most saltwater fish in this manner.

I would also add that the money spent locally by fishermen and women on equipment and bait, along with hotels and travel far exceeds the economic benefit than the commercial fishery. And, if the decline in population continues, a decline in recreational spending is sure to follow.

Thank you

Eric

Comments

From: shaun abbott <shauno624@comcast.net>
Sent: Tuesday, April 06, 2021 8:52 AM
To: Comments
Subject: [External] Striped Bass

Lets make the Striped Bass catch and release only for the months of August September October and November for recreational anglers, or change the regulations so we can only keep one Striped Bass every other day during the fishing season, not ever day.

Comments

From: Christopher McNally <chrisjmcnally@yahoo.com>
Sent: Tuesday, April 06, 2021 8:46 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

I support a plan which contains a narrow slot limit that protects the large spawners and pre-spawn fish. Circle hook mandates for Bait fishing should also be contemplated. we need to take aggressive steps now to protect what is left of the spawning biomass.
Any plans to protect spawning habitat and primary forage fish Should also be pursued aggressively, the longer these decisions are delayed the harder it is to make the "right" choice.

Best, Christopher J. McNally

Comments

From: Rich Collins <rich@thirstproductions.com>
Sent: Tuesday, April 06, 2021 8:45 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7

Please develop a “rebuilding” plan as part of Amendment 7, and work toward adhering to the existing goals and objectives set forth in the past. The fact that the Striped Bass Management board has failed to maintain the current standards is not a reason to change standards. Let’s stick to what was originally planned and not reset the clocks.

Sincerely,

Rich Collins
300 Post Rd
Greenland NH 03840

Comments

From: Norman Yun <yun.norman@gmail.com>
Sent: Tuesday, April 06, 2021 8:21 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

As a community we should all be doing everything we can to help the proliferation of striped bass and all fish for that matter. We constantly ask our children if they're one cookie or two cookie kids but we should be asking if we are one cookie or two cookie adults. If we don't take care of our fish now there won't be enough stripers to catch later. As fishermen that is our responsibility.
Stay safe and tight lines!

Comments

From: Andrew shelhorse <ajshelhorse@gmail.com>
Sent: Tuesday, April 06, 2021 7:47 AM
To: Comments
Subject: [External] Striped Bass PID

Dear Commissioners and officers of the ASMFC,

I appreciate the opportunity to provide comments on the Public Information Document (PID) for Draft Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass. As someone who has fished Long Island beaches for Striped Bass for the last 15 years I have experienced the Striped Bass decline first hand and fear that without immediate and drastic changes, the fishery will disappear. I typically fish over 100 trips per season and almost exclusively practice catch and release. Ten years ago, there were many days and nights that we caught and released multiple Striped Bass over 30". Now we are lucky to get a couple of 30" fish for the whole season. l've never objected to those taking legal limit of Striped Bass, but we are in a state of emergency and must make changes now. I commented on the options below but I personally believe that the changes should be more aggressive.

Ideally I would like to see Striped Bass elevated to gamefish status, like many of the species in Florida for example. The fishery would be catch and release only and allow the fishery to recover fully before changing.

The Striped Bass fishery should be treated like a protected trout stream. Catch and release only with barbless single hook artificial lures. No bait fishing, proper fish handling and reduced open season.

Issue 1: Fishery Goals and Objectives: I recommend that this issue be removed from further consideration for inclusion in Amendment 7. I believe that the goal and objectives are not the problem, but instead the fact that the Striped Bass Management Board has not adhered to them in its actions over the past decade.

Issue 2: Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the Biological Reference Points remain unchanged and that this issue be removed from further consideration in Amendment 7. The fact that the Striped Bas Management Board has failed to maintain a healthy striped bass stock is not a suitable reason for lowering the goalposts

Issue 3: Management Triggers: I am of the view that the four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management. I believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but may not be an appropriate indicator of such a failure.

Issue 4: Stock Rebuilding Target and Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in 4 Amendment 6 should be maintained. In addition, we are strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7

Issue 5: Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6: Management Program Equivalency (Conservation Equivalency): I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7: Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi- year study to to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time I recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release

Issue 8: Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE (see Issue 6).

Issue 9: Coastal Commercial Quota Allocation: While I generally would not comment on commercial allocation issues, it does appear that the landings period used for allocation, which dates back nearly 50 years, is woefully out of date. I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Thank you for the chance to provide input on this important matter.

Sincerely,
Andrew Shelhorse

Sent from my iPad

Comments

From: Alberto <alberto.pina@gmail.com>
Sent: Tuesday, April 06, 2021 6:53 AM
To: Comments
Subject: [External] Stripes bass PID

Dear ASMFC representatives,

The striper population is in serious decline and you should take urgent actions to stop the downfall. I think that you should declare striped bass a game fish and instute a catch and release across the board and along the striper coast in the northeast. Thank you.

Sincerely,

Alberto Pina

Comments

From: Best, Jessica E (DEC) <jessica.best@dec.ny.gov>
Sent: Tuesday, April 13, 2021 3:32 PM
To: Comments
Subject: [External] Striped Bass PID

Hi Emilie,

I know it might be too late to be included in the official record but I wanted to forward these comments regarding the striped bass PID and NY's public hearing.

Thank you,

Jessica

Jessica Best
Fisheries Biologist, Hudson River Estuary Program/Cornell University
Division of Marine Resources

New York State Department of Environmental Conservation
21 S. Putt Corners Rd., New Paltz, NY 12561
P: (845) 256-3009 | F: (845) 255-1701 | jessica.best@dec.ny.gov

www.dec.ny.gov |

On Mar 24, 2021, at 9:48 AM, Ed Skorupski <eskorups@nycap.rr.com> wrote:

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good morning all – hope this note finds you with a touch of "spring fever" – I have it, or it might be a reaction to my 2nd COVID shot????

I listened in on the video conf. Re: Amendment 7 last night – I came out enlightened and confused. Here are a few of my impressions. I should note that during the Q&A, none of the Fisheries Mgrs. Participated despite several questions being directed toward or about Mgrs. Decisions – this resulted in some discontent.

1. This thing is massive – it's like trying to solve "world hunger" – it's fine for a professional but way too many components for the average person/angler.

2. ASMFC is still trying to present a solution to satisfy the commercial and recreational users – by definition commercial v recreational will always be at odds – this is a huge issue – the recreational angler(s) feel that the commercial fisherman "have the ear" of ASMFC – and there

were several comments made last night that inferred this is in fact the case – support and compliance suffer as a result

3. Commercial quota baseline is data from 1972-1979, yet recreational regs are based on the 2018 survey – why hasn't the commercial baseline been time adjusted? Again supporting the perception that "commercial" is favored

4. Data to support (reflect) benefits/gains from recent regulatory changes was not available – how do you convince anglers that reduced anything is a benefit without data – this question was elegantly dodged

5. Can or should the Hudson be managed separately like the Chesapeake seeing as how it is a distinct fishery/breeding group.

6. Somehow ASMFC/DEC needs to get ahead of the curve on regulation changes – as I've discussed at length with Jess, anglers felt/feel that the circle hooks mandate was "dropped" in similar fashion to the slot limit – when in fact they weren't – they were just poorly communicated – the slot limit made a lot more sense to the recreational group when the data related to male/female length distribution showing a large portion of <28" were males and an equally large portion of females >28" – when presented the acceptance gained support, unfortunately, the data was provide post regulation change and this caused the anger.

   In a similar fashion, the same is happening with circle hooks and the suspicion is further underpinned by long held prejudices - as an example – here are a few comments from a couple websites Re: Circle hooks

"Perfect..... I will just fish for catfish with a J Hook and release any stripers I happen to catch
<image001.gif>

I hate circle hooks"

"Circles if you use them enough for stripers truly suck. If you got hook a fish forget about it...and remember Circles were designed to passively hook fish on long lines....try setting the hook with them and it's failure. I'll take a ticket and continue using octopus hooks with eels. Less gut hooks when you can drive the hook home immediately without losing the fish"

I've used circle hooks side by side with octopus using live herring. The hook ratio is totally one sided to an octopus hook. The gut hook leans towards circle. They may work for cut bunker but not a live herring.

These are the proverbial "squeaky wheels" who are torpedoing efforts to protect the fishery – these are also the first people who will be bitching when the fishery is shut down.

I had a friend who swore by "J" hooks and at "circle" hooks – he no longer fishes with me because of it.

Getting consensus in the angling community is like "herding cats", but getting them educated is a good first step. Also, I will interject here in the Sep 2019 Mtg. in New Paltz there were a lot of comments about proper "C&R handling" being a huge contributor to release survival – this should be part of the educational effort

7. Asking what anglers want is too broad – we all want to catch fish – yes, being outside, enjoying nature, teaching other people to fish, taking kids out,….. are all components, but if you don't catch fish – sooner or later you'll stop fishing. Asking them what they would do protect and/or improve the fishery would be more revealing.

8. One of the slides had a comment regarding CO's – again at the Sep 2019 Mtg. there was overwhelming support for an increased number/presence of CO's – we need more of both

In summary to get input and support of the angling community they need to be

- Better informed and in a timely manner
- Provided more educational information
- Make things less complicated – giving them options rather than asking for opinions

That's my 2¢ - Ed

Comments

From: Emilie Franke
Sent: Monday, April 12, 2021 7:41 AM
To: Comments
Subject: FW: [External] Fwd: FW: Comments on Amendment 7 to the Striped Bass Interstate Fishery Management Plan

Emilie Franke | Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Phone: 703.842.0716 | Fax: 703.842.0741
efranke@asmfc.org | www.asmfc.org

From: Martin Gary [mailto:martingary.prfc@gmail.com]
Sent: Saturday, April 10, 2021 11:42 AM
To: Emilie Franke <EFranke@asmfc.org>
Subject: [External] Fwd: FW: Comments on Amendment 7 to the Striped Bass Interstate Fishery Management Plan

Hi Emilie. FYI.....

Martin L. Gary
Executive Secretary
Potomac River Fisheries Commission
P.O. Box 9
Colonial Beach, VA 22443
(804)456-6935
martingary.prfc@gmail.com
www.prfc.us

---------- Forwarded message ---------
From: **Donald** <dnldrs89@gmail.com>
Date: Fri, Apr 9, 2021 at 5:46 PM
Subject: FW: Comments on Amendment 7 to the Striped Bass Interstate Fishery Management Plan
To: LIZZY.2@CHARTER.NET <LIZZY.2@charter.net>, SEN-SOSNOWSKI@RILIN.STATE.RI.US <SEN-SOSNOWSKI@rilin.state.ri.us>, NICOLE.LENGYEL@DEM.RI.GOV <NICOLE.LENGYEL@dem.ri.gov>, ERICREIDRI@GMAIL.COM <ERICREIDRI@gmail.com>, STEVE.BOWMAN@MRC.VIRGINIA.GOV <STEVE.BOWMAN@mrc.virginia.gov>, PAT.GEER@MRC.VIRGINIA.GOV <PAT.GEER@mrc.virginia.gov>, MARTINGARY.PRFC@GMAIL.COM <MARTINGARY.PRFC@gmail.com>, DISTRICT01@SENATE.VIRGINIA.GOV <DISTRICT01@senate.virginia.gov>, BPLUMLEE@PBP-ATTORNEYS.COM <BPLUMLEE@pbp-attorneys.com>, KKUHN@PA.GOV <KKUHN@pa.gov>, SENSEOFWONDER@PA.NET <SENSEOFWONDER@pa.net>, WDELLIOTT@COMCAST.NET <WDELLIOTT@comcast.net>, TISCHAEFFE@PA.GOV <TISCHAEFFE@pa.gov>, KURT.BLANCHARD@DEM.RI.GOV <KURT.BLANCHARD@dem.ri.gov>, JASON.MCNAMEE@DEM.RI.GOV

<JASON.MCNAMEE@dem.ri.gov>
Cc: stripercomments@gmail.com <stripercomments@gmail.com>

Emilie Fran
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am writing to comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I am an avid recreational fly fisher living along the NY coastline. I have been fly fishing for 7 years and the first fish I caught on fly was a 20" striped bass caught on clauser fly cast on an evening outgoing tide along the coast of The Bronx, NY on Labor Day weekend where Long Island meets the mainland. I have since taken guided trips flyfishing for stripers off Montauk, sightfishing in the Great South Bay of Long Island and off the Maine-NH coastline. Each day fishing for striped bass has been equally memorable. I have shared that joy with my son-in-law, Jon, who introduced me to flyfishing and provided my initial impetus to wade into the salt, and hope to pass it along to my grandchildren, Grant and Amelie in the near future. I write because I want to see the fishery protected and nurtured to full recovery.

I have read the PID and the comments of the ASGA which were sent to you. I stand in full agreement with the views expressed therein and urge the Board to retain its existing goals and objective and to execute fully on those goals. I also feel strongly that the Board should not change reference points because the implementation of the goals has fallen short of maintaining a health striped bass stock. I urge you to current 10-year rebuilding timeline should be retained and the Board should expedite development of a rebuilding plan that will succeed within that timeframe. I am also in favor of increasing recreational accountability and imposing recreational limits which will safeguard spawning stocks and ensure a vital fishery, and to apply those limits on a coastal basis until such time as sufficient research exists to permit stock-specific management decisions.

I thank you for receiving and considering my views and those of the recreational angler – and all you do to preserve this important fish for our future enjoyment.

Donald Rose

246 Corlies Avenue

Pelham, NY 10803

Comments

From: Peter Schooling <peter.schooling@gmail.com>
Sent: Friday, April 09, 2021 11:37 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Ms. Franke,

I am a recreational angler in New England who is passionate about keeping the striped bass fishery healthy, accessible and sustainable for all stakeholders.

I have been a lifelong angler, but growing up, I lived a few hours away from the ocean and was only able to visit once or twice a year. The first fish salt water I caught on my own was a striped bass, on a peeler crab in Maryland. Since then I have targeted striped bass in almost every other state in their range.

Since that time I have been totally enamored by these fish and they hold a place near and dear to my heart. I would like to continue to enjoy these fishing for many years to come with friends, family, and hopefully my children.

I am a strong believer in using the best available science to make the most informed decisions. This includes being mindful of current research and assessments that will be published in the near future and utilizing them to make the most scientifically informed decisions.

After doing some research, I would like to enter the following comments on the issues posed in Amendment 7.

Issue 2 - I believe that 1995 should continue to remain as the BRP for management purposes. It has been documented that using this year in the past, along with other reasonable management practices lead to a great increase in striped bass numbers. Why change it now when numbers are on the decline and this species is overfished, especially with new stock assessment data on the way?

Issue 4: - The 10 year target needs to stay in place. We are already 2 into the 10 year mandated improvement period without a plan as it is. It would be detrimental to change this, given the fisheries current state.

Issue 6 - I am all for flexibility in regulations whenever appropriate. Unfortunately, in the instance of CE, this system is being taken advantage of and leading to a further reduction in the health of the striped bass stocks. Striped Bass stocks are overfished and until they have shown sustained recovery, flexibility in regulations needs to be limited. I am opposed to continuing the use of conservation equivalencies until that time.

Issue 7 - As a recreational angler I am very aware of our impact to the fishery and I do my best to minimize this whenever possible. with a Mass DMF study on the way, I believe we need to hold off on addressing this issue until we see the results of this study, utilizing that date to make the most informed decision.

Issue 9 - Why are we using landings data that is over 50 years old? New data should be considered that reflects the current state of the fishery and reflects the best available science, not what is best for the states who may be allocated the most.

I very much appreciate the opportunity to share my comments on these matters. I would be remiss to not include that a significant portion of my fishing expenditures are directly related to perusing these fish. It is important to

remember that there is a significant recreational impact from all the activities associated with fishing for striped bass, not just table or commercial value. These fish should be managed so they are in abundance to all who choose to pursue them, recreationally and commercially.

Very best,

-Peter Schooling

Boston, MA

Comments

From: Joe Uva <j_uva@aol.com>
Sent: Friday, April 09, 2021 10:30 PM
To: Comments
Subject: [External] Massachusetts

To whom it may concern,
The striped bass stock is at an all time low this needs to be addressed before further decline. The slot limit is not helping as people are still violating the rule heavily with not enough law enforcement to keep up while dealing with other investigations. As for adding days for commercial fishing to try to reach quota when it has not been reached. It absolutely blows my mind how does that even make any sense? Maybe there is a reason that they aren't making quota and that's because the stock is low! Not as many larger fish and the count for total is as low as it's ever been! Please think of the species of striped bass I would really love for my kids to be able to catch stripers and not just the small ones we need to start helping our breeders and the up and comers the slot limit does not help!
Thank you

Sent from my iPhone

Comments

From: Michael Byrne <mbyrne197@gmail.com>
Sent: Friday, April 09, 2021 8:46 PM
To: Comments
Subject: [External] Atlantic Striped Bass PID

Dear ASMFC Members,

I'm an avid recreational saltwater angler. I have lived in the Northeast my entire 58 years. I have been fishing the Northeast coast from Maine to New Jersey for 55 years. The love of fishing was past down from my dad to me and I have passed this passion to my son. I moved to Rhode Island 30 years ago and fell back in love with Striped Bass fishing. I am strictly catch and release, fly fishing the majority of my 100+ outings yearly. Over this period of time, I have witnesses the steady decrease in numbers of fish. I remember the dark days of the 70's and 80's when the fishing stocks were depleted and catching a striped bass was rare. So I have lived through the bad times, good times, and unfortunately we seem to be headed back to the bad times.

The signs of a depleted striped bass stock have been with us for many years. My question to this committee is what are you doing to manage the striped bass stock? Knowing how overfishing caused the depleted stock decades ago, why would you let history repeat itself? The time to act is now. It is your and every recreational striped bass fisherman's responsibility to take appropriate actions to save this fishery. I advocate a 100% moratorium on keeping a striped bass of any size. Catch and release only. Putting this in place for 5 years will restore the striped bass stock to acceptable levels. After 5 years, reasonable limits and restrictions should be used to manage stocks to acceptable levels. I believe this the only way to preserve the fishery so future generations can enjoy the gift of striped bass fishing.

Very Sincerely,
Mike Byrne

Sent from my iPad

Comments

From: Joseph Diorio <jdiorio21@gmail.com>
Sent: Friday, April 09, 2021 7:33 PM
To: Comments
Subject: [External] Fwd: Captain Joe Diorio Striper Observations

---------- Forwarded message ---------
From: **Joseph Diorio** <jdiorio21@gmail.com>
Date: Fri, Apr 9, 2021, 2:34 PM
Subject: Captain Joe Diorio Striper Observations
To: <stripercomments@gmail.com>

Hello my name is Joe Diorio. I am a charter captain here in CT. I mainly target striper and run a 100% catch and release striper charter. To give you a little background about me. I have been fishing the long island sound and specifically eastern long island sound for the past 30 years and chartering for the past 4. I am on the water everyday from the beginning of May to the middle of November.

Growing up I was very blessed to say I fished at the very height of the striper fisher. My father took me out every weekend and we caught more striper than I could count. From 1997 to 2016 I can honestly say was the height of our population. We caught striper everywhere and anywhere. Some of my favorite memories growing up were striper fishing with my father and his friends!

Ever since 2016 I have seen a steady decline of stripers and in 2019 it was the worst I've ever seen it. 2020 while I did very well with my charters. I've never had to work so hard to find fish and stay on them. Areas that were loaded with bass pre 2016 are now completely void of them.

While I am happy to see concerns are being made of the health of the fishery. I feel like some of the changes being made are band-aids and we will continue to see this fishery fail.

My first concern is the slot limit. I know it has worked in the past for striper and for other species like redfish and snook, but our biggest population of fish are from 24 to 32 inches. With these limits we are killing off the largest population of fish. These could be the fish to save our fishery! Also at 28 inches these fish are getting to a mature age when they are able to spawn. This slot makes Zero sense to me.

I personally would love to a tag system. Everyone who purchases a license is allowed 1 or 2 striper a season at 48+ inches or bigger. While I know our bigger fish are essential to our fishery and create the most and best eggs for recruitment. These bigger fish when they are caught they don't release as well as the smaller fish do unless they are handled with extreme care. In addition these fish have already spawned multiple times and have laid millions of eggs. By having a slot limit and people not properly releasing these these larger fish were are essentially killing off both ends of the spectrum. Not to mentions the Chesapeake's and Hudson's 18 inch rule which is just ridiculous. Killing a fish before they have the opportunity to spawn. It's just horrible management.

Charter boats are a major issue. There are boats running 2 to 3 trips a day. On a normal 6 pack boat that could be 18 fish a day. If the run 150 trips a year that's 2700 stripers a year just from that one boat. There are

thousands of charter boats up and down the east coast. Charter boats should have a 1/3 boat limit. This would cut down drastically the amount of stripers being kept.

Commercial fishing needs to end. These fish are on the brink of extinction and we have states like Massachusetts who are trying the lengthen the Commercial season. This is not smart. Commercial fishing stripers just needs to end. Plenty of fish that are more plentiful in the ocean to eat. For example sea bass. Limits should be raised on these fish. They are ruining our fisheries here. Eating anything and everything that comes in front of their face. Not to mention they are growing at rapid speeds. Raise the limits on these fish before they do more damage than they already have.

Circle hooks are dumb as well. I grew up fishing circles. We fished them because we thought it was better for releasing our fish. I can honestly say I gut hooked more fish when fishing circles than J hooks. If we want to stop guy hooking fish there needs to be better education on how to fish and when to set the hook. The circles hook rule is a band aid that will not help this fishery.

If we want to get this fishery back serious changes need to be made. No bandaids with a "hope and prayer" that everything will go back to normal.

Thank you for your time. Please any question or concerns feel free to call or email me anytime. 860 214 3437.

Thanks!
Joe

Comments

From: Jack Bhong <jacksuperturbo@gmail.com>
Sent: Friday, April 09, 2021 7:32 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Commissioners and ASMFC staff,
I hope this letter finds you all well and healthy. I'm writing on as one of the founding members of the Brooklyn Urban Anglers Association, a fishing group formed in 2009 focused on exploring New York City's waterways and responsible recreational fishing. I am not at all happy with the Commission's inaction regarding striped bass. The Commission has consistently ignored its own mandates and management triggers, instead favoring what they call "flexibility," which is an uncreative way of maintaining the economic status quo while delaying any real action that could help a diminishing resource. The window is closing, both for striped bass and that economic status quo the Commission bows to.
The public trust in the ASMFC is very low, and this PID does little to instill faith that the Commission is capable of rebuilding the striped bass stocks. The questions it proposes from the opening sentences "[T]he status and understanding of the striped bass stock and fishery has changed considerably which raises concern that the current management program no longer reflects current fishery needs and priorities," throughout the document instill doubt that the Commission can fulfill its mandate and bring itself to meet its own standards. Striped bass are overfished and overfishing is occurring, but the ASMFC has taken little action to rebuild within 10 years as required by their own management triggers. This should have been initiated in 2014 and again in 2019. Now the ASMFC has another opportunity to do what it is required to do by the Commission's own language.
These are my comments on the major issues presented in the PID:
ISSUE 2: BIOLOGICAL REFERENCE POINTS
Changing the BRPs because the ASMFC can't come up with a coherent, effective plan to execute, or even follow their own management triggers and directives is just moving the goalposts. Acceptance of failure due to lack of effort is not an excuse for reconsideration. The answer is NO—do not change the BRPs you established in 2003 just because you've consistently failed to meet the targets.
ISSUE 4: STOCK REBUILDING AND RECOVERY SCHEDULE
The Commission hasn't started on rebuilding the stock within 10 years—a process that should have started in 2014. The Commission should attempt to adhere to its own guidelines for rebuilding the stock before it considers changing any timeline. There should not be any changes based on "flexibility" and the Commission should be accountable to itself. There needs to be commitment by the Commission to rebuild the stock and there needs to be actual steps taken to achieving that goal. So far, there hasn't been any.

REPORT THIS AD

ISSUE 6: CONSERVATION EQUIVALENCY
Just flat out, no. Conservation Equivalency shouldn't be used when trying to rebuild a stock. There's far too much manipulation and circumvention by commissioners and states to keep the economic status quo even as the bass population upon which it depends drops every year—the lowest it has been in over 20 years. If CE is allowed then there must be accountability and paybacks for failing to meet the conservation goals on paper and in practice. Right now, there are none, and that's not acceptable.
It is frustrating to watch the ASMFC spin its wheels and waste its time coming up with reduced requirements for rebuilding the striped bass stock. The Commission itself created the management triggers and the mandated action needed and it is the Commission that has failed to do so. The ASMFC has shown no accountability and little willingness to engage in following their own mandates and policies. The Commission owes it to the public to rebuild trust.
Sincerely,

Comments

From: Robin Sleith <robinsleith@gmail.com>
Sent: Friday, April 09, 2021 7:28 PM
To: Comments
Subject: [External] striped bass PID

Commissioners,

I am writing to you with my comments on the striped bass Public Information Document (PID).

I find myself very frustrated with the state of the striped bass population as it stands today.

I urge the ASMFC commissioners to take actions, through these measures:

1) We should not be managing for harvest, we should be managing for abundance. We should be managing the fish, for the fish's sake. If we do so, the rest all takes care of itself. More fish in the ocean, is more fish to catch.

2) We cannot lower biological reference points. The size of fishery should not be shrunk. We should be NOT be lowering the SSB thresholds, or suggesting that the 1995 value was incorrect in assessing the size of the fishery. We have been at or above this number in the past. The only thing stopping us now is the will of the board to listen to the anglers.

3) We should be more aggressive with rebuilding. The slot limit, and the statistics/models used to defend it, are on such a slow timeline, 10+ years, that they already break the mandate set by amendment 6. Beyond that, we are walking the razor's edge between rebuilding, and collapse. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness or unforeseen weather event, and the fishery collapses.

4) Management measures should be built and maintained for consistency and longevity, and based on robust scientific data.

4) We need to abolish conservational equivalency (CE). In technicality CE can work, but in practicality, it does not. It allows states to escape regulation, and has done nothing but result in overfishing.

6) Aggressive angler education should be conducted to decrease release mortality. We can do more to attenuate release mortality.

7) Whether through a striper stamp or other means, funds should be raised to support enforcement of rules and regulations. Poaching is rampant; both scientific and anecdotal evidence is clear on this. Back door, illegal selling of fish is also a problem (from both recreational and corrupt commercial anglers). These must be curbed, at a minimum, and stopped completely being the goal.

8) Finally, in a perfect world, we would give the fish a break for 5 or more years, with no harvest at all. If we are not going to eliminate harvest, we must take aggressive actions to protect what fish we have left. While I am for allowing occasional harvest, allowing anglers to keep fish every single day, for a huge proportion of the season, is clearly not going to work anymore.

I will reiterate my main point: everyone wants the same thing, and that is more fish in the ocean. Please do whatever it takes to make this happen.

With great concern

Robin Sleith

Comments

From: Mark Philippe <flycaster610@sbcglobal.net>
Sent: Friday, April 09, 2021 6:59 PM
To: Comments
Subject: [External] Comments on Striped Bass

Greetings,

The following are my thoughts on where we should go for the future of striped bass management. These are the iconic fish of the Northeast, and perhaps the Mid-Atlantic.
They deserve out best efforts to help them thrive.

Recreational input into the economy must be taken more seriously. I've fished stripers regularly since 1980. The numbers of boats, guided anglers, and anglers in general are down significantly since bass became more scarce. When bass rebounded post moratorium, sales from bait to boats skyrocketed.

Some of the mortality from recreational fishermen results from the selling of bass, not always legally. That should be weighed with commercial totals.

The main point I wish to make is that decisions on harvest and management need to lean toward the what's best for the stripers. As we have seen, putting bandaids on the problem has failed to deliver optimum results. Let science determine what's best. If the present regulations fail, and stripers disappear, there will be many, many angry people. For example, the present regs place too much of an emphasis on the current abundant year class. Those fish are our future.

When bass are abundant pretty much everyone is happy. When the Feds stepped in and declared a moratorium, it benefited all stakeholders. All but catch and release anglers felt the pain. Wasn't it worth it? All stakeholders survived and then thrived.

Thank you for the opportunity to address this issue.

Sent from my iPhone

Comments

From: Joseph Rogers <rogersjosephmv@yahoo.com>
Sent: Friday, April 09, 2021 6:12 PM
To: Comments
Cc: Michael Armstrong; Rep. Sarah K. Peake; stripercomments@gmail.com
Subject: [External] Striped bass pid

To keep this brief, I believe it's time to consider total protection for striped bass as a game fish and to stop all commercial fishing of striped bass. The survival rate is much higher then it has been stated and a fish is worth more alive then dead for future generations. Take money out of the equation, why would we kill something till it's gone? When do we put conservation ahead of profit??? In my 30+ years of fishing for striped bass on Martha's Vineyard I've seen the population fluctuate dramatically and I think any measure that can be taken to protect one of our most iconic New England species deserves every effort we can make. Thank you, Joseph Rogers.

Comments

From: Doug Schantz <dougschantz1@gmail.com>
Sent: Friday, April 09, 2021 5:39 PM
To: Comments
Cc: stripercomments@gmail.com; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY
Subject: [External] Public Comment - Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass

Dear members of the ASMFC Atlantic Striped Bass Management Board,

Thank you for the opportunity to comment on the Ammendment 7 Public Information Document.

I am a recreational angler on the east end of Long Island and as such I believe it is imperative to ensure the long term abundance of Striped Bass in our waters. I think it's safe to say that everyone benefits from the abundance of these fish and it needs to be a priority to see their population thrive.

Below are my thoughts on the issues presented in the PID.

Issue 1: Fishery Goals and Objectives
I believe that the goals and objectives, as stated in amendment 6, are still appropriate for the management of striped bass.

Issue 2: Biological Reference Points
I believe that the 1995 reference point is still appropriate and recommend that it remains unchanged.

Issue 4: Stock Rebuilding Target and Schedule
I believe the 10 year rebuilding timeline should not be extended and that the stock should be rebuilt to the target level by 2029 as is currently stated in amendment 6.

Issue 5: Regional Management
Due to the current striped status and the fact that the science is not yet there to inform stock specific decisions, I think it is best to remove this issue from further consideration.

Issue 6: Management Program Equivalency
I do not think that conservation equivalency should be allowed in the management process. It creates too much uncertainty especially when the stock numbers are lower than they should be.

Issue 7: Recreational Release Mortality
I think it is best to focus on educating anglers on the best practices to minimize release mortality. Also, where the science is sufficient I think it is wise to implement regulations to improve the number of healthy releases (such as mandating the use of circle hooks.)

Thank you for your consideration.

Sincerely,
Douglas Schantz

Comments

From: Joe Pagano <joe@stuffitcharters.com>
Sent: Friday, April 09, 2021 5:36 PM
To: Comments
Subject: [External] Sorry Rick, but I would be fine with more fish in the water. Joe Pagano

Comments

From: Donald <dnldrs89@gmail.com>
Sent: Friday, April 09, 2021 5:25 PM
To: TOM FOTE; Roy Miller; David Saveikis; Rep. William J Carson; Craig D Pugh; Bryan King; Daniel Ryan; Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT; Russell Dize; MICHAEL LUISI; David Sikorski; Del. Dana Stein; BILL ANDERSON; Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; Dennis Abbott; RITCHIE WHITE; Cheri Patterson; Cheri Patterson; KEVIN SULLIVAN; Sen. David H. Watters; C. LOUIS BASSANO; HEATHER CORBETT; Adam S. Nowalsky; ERIC HOUGHTALING; Emerson Hasbrouck; Maureen Davidson; James Gilmore; Sen. TODD KAMINSKY; Chris Batsavage; Sen. Bob Steinburg; Jerry Mannen Jr.; BILL GORHAM; JOHN BATHERSON; Rep. Melissa Ziobron; ROBERT LAFRANCE; Sen. Craig A. Miner; WILLIAM HYATT; Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments on Amendment 7 to the Striped Bass Interstate Fishery Management Plan

Emilie Fran
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am writing to comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I am an avid recreational fly fisher living along the NY coastline. I have been fly fishing for 7 years and the first fish I caught on fly was a 20" striped bass caught on clauser fly cast on an evening outgoing tide along the coast of The Bronx, NY on Labor Day weekend where Long Island meets the mainland. I have since taken guided trips flyfishing for stripers off Montauk, sightfishing in the Great South Bay of Long Island and off the Maine-NH coastline. Each day fishing for striped bass has been equally memorable. I have shared that joy with my son-in-law, Jon, who introduced me to flyfishing and provided my initial impetus to wade into the salt, and hope to pass it along to my grandchildren, Grant and Amelie in the near future. I write because I want to see the fishery protected and nurtured to full recovery.

I have read the PID and the comments of the ASGA which were sent to you. I stand in full agreement with the views expressed therein and urge the Board to retain its existing goals and objective and to execute fully on those goals. I also feel strongly that the Board should not change reference points because the implementation of the goals has fallen short of maintaining a health striped bass stock. I urge you to current 10-year rebuilding timeline should be retained and the Board should expedite development of a rebuilding plan that will succeed within that timeframe. I am also in favor of increasing recreational accountability and imposing recreational limits which will safeguard spawning stocks and ensure a vital fishery, and to apply those limits on a coastal basis until such time as sufficient research exists to permit stock-specific management decisions.

I thank you for receiving and considering my views and those of the recreational angler – and all you do to preserve this important fish for our future enjoyment.

Donald Rose
246 Corlies Avenue
Pelham, NY 10803

Comments

From: Ronald Meza <ronaldmeza10@gmail.com>
Sent: Friday, April 09, 2021 5:19 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Amendment 7 to the Stripped Bass Interstate Fishery Management Plan

I believe the the Commercial Allocation needs to be revisited, especially with a focus on Omega Protein. This company needs to be held accountable for the disregarding of what this organization is trying to accomplish. A slap on the wrist for over-harvesting is not acceptable. Please take action to correct this issue.

Sincerely ,
Ronald Meza

Comments

From: John Curtis <johncurtis076@gmail.com>
Sent: Friday, April 09, 2021 5:03 PM
To: Comments
Subject: [External] SAVE the STRIPED BASS!

ONE ANGLER'S VOYAGE

After spending over 50 years on and around the water, I have realized that without strong fisheries laws and effective conservation measures, the future of salt water fishing, and America's living marine resources, is dim. Yet conservation is given short shrift by national angling organizations and the angling press. I hope that this blog will incite, inform and inspire salt water fishermen to reclaim their traditional role as the leading advocates for the conservation of America's fisheries.

Monday, April 5, 2021

STRIPED BASS: WHAT FISHERIES MANAGERS STILL DON'T UNDERSTAND

I was finishing up my comments on the *Public Information Document For Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass*, when one of the questions asked in the "Recreational Release Mortality" section stopped me cold.

It was

> "Should management focus on reducing effort in the fisher in order to reduce the number of striped bass caught and released?"

I read that question and wondered, "Why would ***anyone*** want to do ***that***?"

The fact that the question was even asked demonstrates how badly managers misunderstand the recreational striped bass fishery.

During the years 2015-2019, anglers released almost 92 percent of all striped bass caught. The percentage has remained very consistent through the years, ranging from a low of 89.26 percent in 2015 to a high of 93.33 percent in 2018. Out of the more than 170 million bass caught during that five-year period, nearly 157 million were returned to the water.

While many of those released fish were undersized, and could not be legally retained, many others were voluntarily released because, for the most part, striped bass anglers primarily seeking recreation, ***not*** food, when they spend time on the water, although most probably do keep a bass from time to time.

Right now, the best available science suggests that about 9 percent of all released bass die. That's a relatively low release mortality rate, which compares very favorably with release mortality rates of 10 percent for summer flounder, and 15 percent for scup, black sea bass, and bluefish.

Still, 9 percent of the 157,000,000 bass released over the course of five years isn't a trivial number. It's not surprising that recreational release mortality accounts for nearly half of all striped bass fishing mortality. That's what you'd expect in a fishery that's prosecuted primarily for catch-and-release, not catch-and-kill.

But fishery managers don't see it that way. The so-called "Work Group" report that preceded the Public Information Document stated that

> "Multiple members of the [work group] indicated that recreational dead discards may be the single most important issue at this time, and addressing (or reducing discards) is the most important action that can be taken going forward. Many [work group] members

> pointed to the fact that recreational discards accounted for just under 50% of the fishing mortality as a basis for the critical need to address this issue. Others noted that, particularly in states with primarily catch and release fisheries, the Board is running out of ways to control removals in the fishery."

Looking at the issue objectively, those comments just don't make sense.

But they do reflect an unfortunate bias that still prevails among marine fisheries managers. Too many of them are still operating within an outdated paradigm that can be summed up as "Dead fish in a cooler are good. Dead fish in the water are bad. Our job is to keep enough live fish in the water to put lots of dead fish in coolers."

As I mentioned in a recent blog, things like maximizing recreational opportunity, and by so doing maximizing the economic benefits from the fishery, just don't cross their minds.

It's all about putting dead fish in the coolers.

Think about it. Have you ever heard a fishery manager say that there is a "critical need" to address ***landings*** because they constituted "just under 50% of the fishing mortality." In the striped bass fishery, combined recreational and commercial landings account for ***exactly 50 percent*** of fishing mortality (recreational landings at 42 percent, commercial landings at 8 percent), but not a single manager is talking about "the critical need to address this issue," because they value dead fish in a cooler. Recreational release mortality is being singled out as the problem, because they can't comprehend that some additional dead fish in the water might be the price that needs to be paid in order to appropriately manage the striped bass fishery.

Yet the real problem is fishing mortality ***from all sources***, not just recreational releases. As I've written many times before, dead is dead. A bass that dies after being released is no deader, and has no more adverse impact on the stock, as a bass that slowly succumbs to asphyxiation while lying on ice in a cooler.

Yet marine fisheries managers, particularly in the northeast and mid-Atlantic, remain focused on landings as the gold standard of fisheries management. That makes sense when managing a primarily commercial fishery, or a recreational fishery prosecuted primarily for food, such as summer flounder, bjut it makes no sense at all when managing a recreational ***sport*** fishery such as striped bass.

In such fisheries, anglers' primary motivation is to encounter, and hopefully catch, fish on a regular basis, even if the great majority—but not all—of those fish end up being released.

Such fisheries should be managed for abundance. Abundance drives angler effort, and increased effort results in increased recreational opportunity, and the increased economic benefits that result.

When a fishery is managed for abundance rather than for landings, recreational release mortality is likely to rise, but so long as overall fishing mortality stays at or below target, that's not a problem.

However, higher levels of release mortality do mean that restrictions on landings must be tightened to keep overall fishing mortality under control. And for traditional marine fisheries managers, who worship at the mid-20th Century altar of maximum sustainable yield, the idea of intentionally managing in

a way that increases release mortality and leads to lower landings is an inconceivable heresy.

In that regard, marine fisheries managers in the northeast and mid-Atlantic are at least 50 years behind the times.

Both in freshwater fisheries and in saltwater fisheries elsewhere on the coast, no-kill regulations (e.g., many “quality” trout waters, Florida tarpon and bonefish) and restrictive regulations that promote catch-and-release angling (muskellunge, Alaska for-hire halibut, Florida snook and permit) are frequently seen.

But on the East Coast, fisheries managers remain laser-focused on maintaining landings. Thus, the PID’s baseless complaint that “in states with primarily catch and release fisheries, the Board is running out of ways to control removals in the fishery.”

After all, ***if the state’s striped bass fishery is primarily catch and release***, managers can adopt very restrictive restrictions on landings without significantly disrupting that fishery. Some for-hire operators might be unhappy with more landings restrictions, but given that, using the same 2015-2019 timeframe used above, the for-hire fleet only accounted for a little over 2 percent of all striped bass trips (low of 1.60 percent in 2016, high of 2.73 percent in 2017), such concerns flow from a very small sector of the recreational striped bass fishery; management should reflect how the resource is used by the great majority of anglers.

Some managers have reportedly asked what more they can do when the bag limit has already been reduced to one fish. The answer to that question is simple: More restrictive size limits, and shorter seasons.

Folks who manage other recreational sport fisheries, in both fresh and salt water, have already figured that out.

For example, Wisconsin has decided to

> "Manage muskellunge for a variety of unique fishing opportunities (including trophy, quality action, and harvest) within balanced aquatic communities,"

by maintaining

> "A. Trophy Fisheries—Manage Class A1 waters to increase the catch of 45" and larger muskellunge, with some fish 50" and larger.
>
> B. Action Fisheries—Manage Class A2 waters for a catch rate of 1 muskellunge (any size) per 25 hours of muskellunge angling.
>
> C. Improve Existing Fisheries—Rehabilitate former muskellunge waters that have experienced substantial declines in the muskellunge population; improve Class B and C fisheries."

Wisconsin also stresses the need for education that complements its muskellunge management program, and is taking steps to

> "Provide information and technical assistance to our partners, anglers, and lakeshore property owners. ***Continue to emphasize the value of catch and release***. Clarify the role that muskellunge play within aquatic ecosystems, including interactions with other species. [emphasis added]"

The muskellunge's role in freshwater fisheries is roughly analogous to the striped bass' role on the coast. Both fish are apex predators in their ecosystem, and among the largest fish encountered by anglers in the waters where they swim. Both also support what might be called "prestige" recreational

fisheries; anglers who catch a large striped bass, like those who catch a large muskellunge, tend to be proud of their accomplishment, and often appear in the pages of local outdoor publications.

But the management is so much different.

In Wisconsin, fishery managers recognize what's important to muskellunge fishermen. They may write about managing for "trophy, quality action, and harvest," but the state's natural (i.e., non-stocked, "Class A") waters are being managed primarily for either "trophy" or "action" fisheries; regulations permit harvest in such waters, but such harvest is subordinate to the other two management goals.

Like striped bass, muskellunge enjoy very low release mortality rates when caught on artificial lures and properly handled prior to release, although research shows that they suffer very high levels of delayed mortality when caught on live bait, where gut-hooking is often an issue. While Wisconsin fishery managers seek to encourage anglers catch and release muskellunge, the ASMFC, which clearly doesn't recognize what's important to most striped bass anglers, would consider limiting catch-and-release, so that more bass could be killed and brought home.

The ASMFC just doesn't understand how to manage a truly recreational fishery.

In salt water, Florida's snook regulations may provide the best example of how managers should address such fisheries. Snook fishing is, in many ways, like fishing for striped bass—you can catch them in inlets and around structure such as bridges and piers, cast to shorelines (typically mangroves instead of sod banks or stone), fish for them in the surf, etc.

Not to mention the fact that snook taste at least as good as striped bass do.

Like striped bass, snook are managed with a 1-fish bag (although on a for-hire boat, neither captain nor crew may retain a fish) and a slot limit. But, where the striped bass slot includes fish falling between 28 and 35-inches, the snook slot is narrower, 28 to 32 inches on the Atlantic coast and 28 to 33 inches on the west coast and Everglades. The snook fishing season is also closed from December 15-January 31 and June 1-August 31 on the Atlantic side, and December 1-February 28 (or 29) and May 1-August 31 in the Gulf of Mexico/Everglades to further protect the fish (in recent years, parts of the Gulf have been completely closed due to the effects of red tide on the local snook population).

As with striped bass, recreational release mortality makes a contribution to overall snook fishing mortality. The State of Florida believes that such release mortality makes up no less than 43 percent, and very probably about 50 percent, of all snook fishing mortality. That falls right into line with release mortality's 48 percent contribution to striped bass fishing mortality.

But Florida, unlike the ASMFC, isn't even talking about reducing catch-and-release fishing effort in order to increase snook landings. Instead, it acknowledges the recreational and economic value of what is primarily a catch-and-release fishery (one state study showing that about 97 percent of fish caught on the Gulf coast were returned to the water), and crafts its snook regulations to take account of both landings and release mortality—even if that means closing the fishery during the height of the winter tourist season, when light-tackle guides and other for-hire operators would undoubtedly profit from an open season.

Because that's how a recreational sport fishery ought to be managed: For abundance, for maximum recreational opportunity, and maximum recreational effort.

Landings are, at best, a secondary consideration.

East Coast managers need to figure that out, for if they don't, they'll get striped bass management wrong.

Again.

Posted by Charles Witek at 11:45 AM

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2 comments:

1. 

   Greg S. April 6, 2021 at 5:14 PM

   As a fishing guide and someone who sells boats to sportsmen, all I can say is AMEN!

   Reply

2. 

   DaveApril 9, 2021 at 7:58 AM

   I agree whole heartedly with this article, however as one who fishes mostly in cape cod Bay when will we address the elephant in the room?
   The huge increase in seals isn't just bringing great whites.

   Reply

Comments

From: Mike Lorello <mikelorello@icloud.com>
Sent: Friday, April 09, 2021 4:59 PM
To: Comments
Subject: [External] Striped Bass pid

ASMFC

Good afternoon my name is Mike Lorello I'm a recreational fisherman living in South Portland Maine. I started fishing for striped bass in the mid 90s as a teenager. I pretty much eat drink and sleep striped bass. The last 20+\- years of my life have revolved around these fish from vacations to actually taking a job making less money to have more time to chase these fish. The fishery now isn't worth planning a vacation for. In the years I have striper fished I have seen angling effort go up every year and last decade or so the quality of the fishing go down every year.

It's time for a 5-10 year moratorium before we you all of us see irreversible damage to this fishery. Please consider a MORATORIUM!!!!

Thank you

Sent from my iPhone

Comments

From: John Jinishian <john@wildriverfish.com>
Sent: Friday, April 09, 2021 4:57 PM
To: Comments
Subject: [External] Striped Bass PID

Hey Emilie,

As an angler and guide in the waters of the Norwalk Islands over the last 30 years I have seen many changes within our striped bass populations over my lifetime. I have strictly been a catch and release angler for stripers and mostly target them on Fly or light tackle spin gear.

In recent years in the fisheries I fish most frequently (New York, CT and RI) I have seen a significant decline in breeding class fish. Spring and fall runs of schoolies remain somewhat consistent but I have noticed a decline in the numbers in this category in the last 5 years as well. While I do understand that some fisheries have been thriving in the larger fish classes, we have seen significant declines my fisheries.

I have been in favor of a moratorium for striped bass for a number of years and find that it is more important to rebuild our stocks quickly so we can properly mange them for future generations. While I am in favor of a mandate to use circle hooks when bait fishing, I don't think this is enough to cause the change we need in the fishery. In addition to being in favor of proposed circle hook changes, I do think gaffing or striped bass should not be permitted in any fishery. I am not personally opposed to netting fish properly and can be easier on the fish then using lipping devices. While I think proper handling of fish is paramount and the lowest mortality rates will be achieved by keeping fish in the water and reviving them properly, netting can be a lot easier on fish on vessels with higher freeboard who cannot revive fish as effectively from an elevated platform. I do agree with the banning of treble hooks and switching to inline single hooks when fishing plugs and swimmers.

I think management should be focussed on reducing striped bass fishing during spawning seasons but migratory fish should be allowed to be targeted and properly released. I do think because stripers are sensitive to warm waters, restrictions could be put in place to limit targeting of fish when chances of mortality are increased. One of the biggest issues I think facing our state is enforcement, not the adequacy of the job but the number of enforcement officers present to hold anglers accountable, especially in the western long island sound.

I understand that commercial fisherman need to make a living just as recreational guides do but I do think quotas need to be severally reduced to help build our stocks back up. I think that we should mange our quotas in a annual basis and only open up certain class fish during certain times of the season so the target is not consistently on a single class of fish. Recreational charter head boats should have a total number of allowed fish per day and not allow each angler to harvest one fish. If they go out for multiple charters a day, they may be taking more then a dozen breeding class fish which I feel to be extremely detrimental to the stocks. We do need to limit numbers of fish kept.

I do appreciate the time you have taken to read my comments and act as a representative for anglers throughout the northeast fisheries. Hopefully we will have the opportunity to save this incredible gamefish and increase the resources of our fish stocks to be enjoyed for generations to come.

Best,

John

Capt. John Jinishian
Alaska's Wild River Guides, Owner
www.Wildriverfish.com
203-247-9070 (Off-Season)
907-843-9075 (In-Season)
John@wildriverfish.com

Wild River Guides
Alaskan Fly Fishing Adventures

Comments

From: stryker91266@aol.com
Sent: Friday, April 09, 2021 4:59 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] AMENDMENT 7 - Striped Bass

As a lifelong angler who is now teaching my 8 year old daughter to fish, I am not only disheartened , but also extremely disappointed that the Striped Bass Management Board has not adhered to maintain the striped bass stock as per prior Amendment. It is the duty and responsibility of this Board to elevate this issue of the rapidly declining striped bass population with a cogent, cohesive and timeline based plan to ensure the future of the striped bass stock inasmuch as it is critical not only to the ecosystem, but also to generations of future anglers and family memories.

Sincerely
Scott Stryker

Comments

From: Peter Blasi <pblasi1234@gmail.com>
Sent: Friday, April 09, 2021 4:58 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

My name is Peter Blasi and I am from the State of Rhode Island. I am in my mid-40s and have watched the Striper stocks dwindle away over the years. Please make this great fish a sportfish and provide the protection it needs to rebuild its stocks. The time is now. Thank you for considering this request.

Peter Blasi

Sent from my iPhone

Comments

From: Jeff <jepanz@yahoo.com>
Sent: Friday, April 09, 2021 4:58 PM
To: Comments
Subject: [External] Subject: Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

Ms. Franke,

ISSUE 1: The existing goal and objectives of Amendment 6 are absolutely still in line with current striped bass fisheries needs and priorities. The goals stated of perpetuating migratory stocks of striped bass, allowing long-term maintenance of a broad age structure, a self-sustaining spawning stock and the restoration and maintenance of striped bass essential habitat remain paramount for the current state of the fishery.

ISSUE 2: The 1995 estimate of female spawning stock biomass ("SSB") continues to be the appropriate benchmark for determining stock status. Broad abundance in fish size and diverse age structure that can sustainably support appropriately calibrated recreation and commercial fisheries are the stock characteristics that are targeted for achievement.

ISSUE 3: Management Triggers established in Amendment 6 #1-4, as identified in the PID, continue to be appropriate. With respect to Management Trigger #5, it would be prudent to review and revised as may be deemed appropriate following such review.

ISSUE 4: The current ten-year stock rebuilding timeline specified in Amendment #6 needs to ne maintained with the plan for rebuilding the stock within this established timeframe implemented urgently. The current state of the fishery does not support further delay.

ISSUE 5: Remove this issue from further consideration in respect of Amendment #7 on the basis that the scientific data supporting the proposal is not sufficiently available at this time.

ISSUE 6: Conservation Equivalency ("CE") is a misnomer for what constitutes no more than a loophole to be exploited by non-compliant member states without consequence. The only appropriate utilization of the concept of CE would be in conditions wherein the striped bass stock is neither overfished nor then experiencing overfishing, and wherein the member states implementing CE in such conditions are held accountable for their CE actions taken.

ISSUE 7: Recreational release mortality, while of significance to the overall health of the striped bass stock, is premature to address in Amendment #7. The fact that the issue in question cites to a small singular study from 1996, while we are in the year 2021 highlights the point. The issue should be reconsidered following such time as additional studies are completed.

ISSUE 8: Recommend removal from Amendment #7. Issue in question is not ripe for inclusion in Amendment #7.

ISSUE 9: Recommend that the Striped Bass Board work with the Technical Committee on the question presented in Issue 9.

ISSUE 10: Yes, Impacts due to climate change, including possible loss of prey due to changing environmental conditions; habitat degradation; limited resources for law enforcement and research priorities (including continuing to examine the mixed stock nature of the striped bass stock) are recommended for inclusion in Amendment #7 guidance.

Regards,
Jeff Panzo

Comments

From: Matthew Zimmermann <mzimm03@gmail.com>
Sent: Friday, April 09, 2021 4:57 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Comments on the PID for Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

o Whom It May Concern,

My name is Matt Zimmermann and I'm a rec angler based out of Beverly, MA.

I am a passionate Striped Bass fisherman, who wants to make sure that Striper population is healthy enough for the future for us all to enjoy it.

We need to fight to protect the future of Strped Bass!!

In general I believe a moratorium would be beneficial, 1 fish limit 35 inches + coast wide, or a higher slot limit of 34 - 40 inches. But in regards to the PID please see my comments below.

My goal in commenting is to do my small part to help ensure a future that includes a healthy striped bass population and fishery, and please see my thoughts below on the specific issues brought up in the PID.

Issue 1—Goals and Objectives: The current goal and objectives for the fishery are sufficient, and I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent

uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you,

Matt Zimmermann

Comments

From: Anthony Sarcona <tony.sarcona@gmail.com>
Sent: Friday, April 09, 2021 4:52 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 PID

To whom this may concern,

As a recreational fly fisherman and guide service, I have the following concerns with Amendment 7. As a large group of charter, guide, and recreational fishermen and women, We **believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.**
We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.
We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.
Please make the right decision by keeping the fishery sustainable for generations to come rather than short term profits. Thank you for your time and consideration.

Sincerely,
Tony Sarcona
Maine_Flyfish Guide Service

Comments

From: Gianfranco Z <gzaffina13@gmail.com>
Sent: Friday, April 09, 2021 4:52 PM
To: Comments
Cc: stripercomments@gmail.com; 2021striperpid@gmail.com; Justin Davis
Subject: [External] Striped Bass PID

Dear Committee,
My name is Gianfranco Zaffina, I am an avid surfcaster from Westport, CT. My primary target are Striped Bass and I am writing to you today because they need our help, but most importantly your help.

I have done my part the last decade trying to protect and preserve these incredible fish. I have not willingly killed a bass In over 10 years. I educate and try to promote proper catch and release and responsible angling tactics to friends and anyone I encounter. As one of the youngest acting members of the Westport Striped Bass Club, I hear plenty of stories of the moratorium from the old timers, the changes in the 90s, then the rebuild of the early 2000s that I was lucky to take part and witness, and now today to where we are, this disaster of a fishery. Total mismanagement.

These fish are in trouble and I'm afraid myself and others have lost confidence in the competence of the ASMFC. We need a rebuild of this stock within 10 years, it should be much shorter than that but judging by the track record of the ASMFC I won't hold my breath.

In regards to Amendment 7, I urge you to NOT lower the SSB threshold, doing this would be devastating to the fishery.

We must reduce mortality greatly in the recreational sector and that includes catch and release fishing by regulating gear/methods used.

Commercial fishing needs to be addressed based on current health of the overall stock. If we look at the Massachusetts commercial season and how short they have fallen these last few seasons, that is major red flag on the decline of the fishery. We need to reduce commercial numbers, it makes no sense to continue to kill breeder fish for such a small commercial market.

I would like to see more research done on individual spawning stocks aside from the Hudson and Chesapeake, this can help us protect and aid these other stocks and help the fishery as a whole.

Thank you for your time, I am asking the committee to take immediate action to protect and help these fish for the present and future generations of anglers across the coast. We need positive change before it is too late.

Comments

From: benny.mondello@verizon.net
Sent: Friday, April 09, 2021 4:44 PM
To: Comments
Subject: [External] Stripe Bass and Bluefish Regulations

Greetings ASMFC,

As a long time Striper and Bluefish Surfcaster I've been able to witness the continuous decline in these magnificent species.
These past several years have been the worst that I can ever remember.
I hope that all efforts are made to protect these wonderful creatures that bring so much joy to the surf fishing community.

Sincerely,

Ben Mondello

Sent from my iPhone

Sent from AOL Mobile Mail

Comments

From: Nick Davidovich <nickdbbq@gmail.com>
Sent: Friday, April 09, 2021 4:41 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hello,

This is Nick Davidovich. I have spent almost the past 20 years as a chef and outdoorsman and I am writing to share my thoughts on the amendment 7 PID.

To keep it short, I agree with most of the positions the ASGA has taken in regards to the PID. I agree that goals and objectives are not the problem, but the following of said goals and objectives are not being followed or taken seriously. I also agree with 1995 being an appropriate reference year for bass numbers and because of this I support that the ten year rebuilding timeline remains in place and would like to see a rebuilding plan for striped bass.

I can go on, and continue to reiterate their additions talking points, but my honest opinion on rebuilding will hopefully be more useful. While the ASGA is a science first organization, lack of up to date science does not excuse lack of action. While the ASGA does not currently support a moratorium (like Stripers Forever), all options should be on the table. Something is amiss, and people who fished through the last collapse are the canaries in the coal mine.

Now I will not blame any one group, be it recreational mortality, commercial fishing, charter boats, or party boats for the current decline. For all we know environmental factors are the main reason? Warming, habitat changes, massive growth in seal populations can also have a finger pointed at them. But until the science can really pinpoint the cause of striped bass trending down, I personally would not mind seeing an extra careful or overly cautious approach to striped bass management and rebuilding.

I have been a part of several outdoor organizations over the years. I preached using Seafood Watch as a chef. Waterfowl, trout, cod, all have their stories of mismanagement and habitat destruction. What is always forgotten is the struggle to bring these creatures back. We are always kicking the can down the road and hoping that they can hold out until we figure out a solution as to not make our lives uncomfortable. Let us please set a new standard of protection, and start with the striped bass.

Thank you for your time. If in the off chance someone is interested in talking more, or would like clarification on any of my opinions, please feel free to get in touch through this email.

Nick Davidovich
Cambridge, MA

Comments

From: Andrew Dangelo <maridee2@gmail.com>
Sent: Friday, April 09, 2021 4:38 PM
To: Comments
Subject: [External] Comments

I just to say that I agree with everything that Rick Bellavance stated in his comments and emphasize that striped bass should be managed so that all user groups get to utilize the resource and it should be put under game fish status

Thank you
Capt Andy Dangelo
Maridee sportfishing

Sent from my iPhone

Comments

From: Craig Harkness <charkness31@yahoo.com>
Sent: Friday, April 09, 2021 4:39 PM
To: Comments
Subject: [External] Striper Fishery

Hello,

With seeing the how the fishing has declined in the striped bass category. I would love to see some kind of season that is only open for the month of March and then closed until August or something like that.

Maybe even a season that is open how it is now and closed the next season. Alternating open/closed seasons.

Thanks!
-Craig Harkness

Sent from my iPhone

Comments

From: Chris Wilson <cfrankwilso@gmail.com>
Sent: Friday, April 09, 2021 4:32 PM
To: Comments
Subject: [External] Striped Bass Fishery

Dear Commission,

I'd like to reiterate the concerns that my brother Scott just voiced to you regarding the over harvesting of Striped Bass. From my personal fishing experience, I've noticed that stripers are much less abundant than in past years — and unfortunately the data bears this out as well.

Striped bass need to be protected by reducing the number of fish that can be kept by any angler to one per month. Additionally, no individual (commercial or recreational) should be permitted to keep breeding sized fish in any circumstance.

Tackle shops and online retailers need to be incentivized to sell less harmful equipment, and should be empowered by the state to promote safer catch and release practices when interacting with customers.

Sincerely,
Chris Wilson, NY resident
781-383-9991

Comments

From: Paul Barrile <prbarrile@gmail.com>
Sent: Friday, April 09, 2021 4:28 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Atlantic Striped Bass PID

Hello

The Atlantic Striped bass is such an important fish to so many people. Some people contribute to their income by catching them while others fish for them as recreation and spend plenty of money in doing so. It is clear that the population is at a point where it needs our help to rebuild. I do not agree with using a year with a lower population calculation than 1995. 95 was the year the bass were deemed rebuilt, it is the population number that we should be using as the baseline for yet another rebuild. Any lower number used is disingenuous as it will forever lower the expected population. Don't water it down. We should be trying to have as robust a population of stripers as possible, not trying to lower the bar so we can reach it easier. Strive for greatness, get to the number that is harder to get to, it is for the benefit of not only the people who fish for them, but the bass themselves. I have heard of the "conservation equivalency" and my opinion is that, if the fish are not in trouble maybe it is an option. But not all states are playing fair and what's worse, they are not being punished when they don't. The entire striper coast should be doing what they can to help bring the fish back as soon as possible, not looking for loopholes to skirt the rules and potentially damage the population for future generations. Leave conservation equivalency out right now and focus on rebuilding the stock. It's been 2 years since the bass have been deemed overfished, what has been done to turn the tide? Maintain the 10 year rebuild plan and get going on it all ready. Bring the fish back to the population numbers that they should be at If it takes a moratorium to get the fish back to 125% or whatever it is of 1995 numbers, so be it. I would rather not keep any fish and have a greater population for years and years than keep them now and not have them in the future.

I want my kids and hopefully my grandkids to have the ability to fall in love with stripers the way I have. It is an activity that anyone can enjoy but you need the fish to be there. A greater population of fish means greater opportunity to catch a fish. We all spend lots of time and lots of money trying to catch a striped bass. It is the pinnacle inshore species for the Northeast. We are all out there with the same goal, to try and catch a striper. That's what makes you fall in love with it. The tug is the drug as they say. Give people a greater chance to experience that by having the population of bass that both people and the bass deserve.

Thank you
Paul Barrile

Comments

From: Scott W <wilson.f.scott@gmail.com>
Sent: Friday, April 09, 2021 4:25 PM
To: Comments
Subject: [External] Striped Bass PID

Dear Commission ,

I'm writing to express my concern about the over harvesting of Striped Bass. From my personal fishing experience, I've noticed that stripers are much less abundant than in past years — and unfortunately the data bears this out as well.

Striped bass need to be protected by reducing the number of fish that can be kept by any angler to one per month. Additionally, no individual (commercial or recreational) should be permitted to keep breeding sized fish in any circumstance.

There also needs to be a stronger effort on behalf of states to strengthen existing regulations and public awareness campaigns around recreational release mortality. People don't realize that they're accidentally killing fish and they don't understand how properly release striped bass. **Tackle shops and online retailers need to be incentivized to sell less harmful equipment, and should be empowered by the state to promote safer catch and release practices when interacting with customers.**

Learning to fish taught me a much greater appreciation for our environment. The states need to take urgent action and commit significant investment to protect our ecosystems and prevent yet another species from becoming endangered due to human recklessness and ignorance.

Sincerely,
Scott Wilson, NY resident
781-383-9616

Comments

From: Michael Schlaker <mschlaker@gmail.com>
Sent: Friday, April 09, 2021 4:27 PM
To: Comments
Cc: stripercomments@gmail.com; KURT BLANCHARD; Jason E. Mcnamee; DAVID BORDEN; Sen. Susan Sosnowski; Nicole Lengyel Costa; Eric Reid
Subject: [External] Striped Bass PID

Dear Ms. Emilie Franke and members of the ASMFC Striped Bass Mgmt Board,

Thank you for taking time to consider my comments on Amendment 7.

The declining population of Atlantic Striped Bass is an issue that is of immense importance to thousands of fellow conservation-minded recreational anglers on the East Coast. Having lived in Rhode Island for only 20 years, I am a relative newcomer to striper fishing, so I am in no way an expert in the science, nor a first-hand witness to the full cycle of the species' decline. I am, unfortunately, witnessing the current decline and hope this effort will make an impact in some small way. Surfcasting for striped bass has not only has become a huge part of my relationship to the natural world here in Rhode Island, but more importantly, has evolved into a wonderful, complex, and deep shared connection with my 17-year old son, Louis. Whatever I can do to influence the chances of him sharing a similar experience with his kids one day is extremely important to me, and I'm happy to have the opportunity to weigh-in now on the effort to help revive the stock of this amazing fish.

There are two overarching goals that I'd like to see with regards to the striped bass fishery: lowering the striped bass mortality rate AND reviving a healthy balance to the age range of the species. With these in mind, I would like to voice my sincere endorsement of the American Saltwater Guides Association's 10-point recommendations for Amendment 7. Of particular importance I would like to emphasize the following points:

- Removing the topic of BRPs from Amendment 7; I agree with ASGA's assessment that the BRPs set forth in Amendment 6 are entirely acceptable.
- Continuing the existing 10-year striped bass stock rebuilding plan set forth in Amendment 6, **but to also include** language in Amendment 7 that not only specifies this but demands what specific actions and under what timelines these actions must be taken.
- Conservation Equivalency should not be considered as a legitimately effective tool to manage the health of the striped bass fishery until there is robust scientific data that shows the current bass stock has stabilized and is not being overfished.

I truly appreciate your consideration of these comments in the development of the Draft Amendment.

Best Regards,

Michael and Louis Schlaker
Providence, Rhode Island

Comments

From: Behot, Joseph F. <jbehot@cullenllp.com>
Sent: Friday, April 09, 2021 4:26 PM
To: Comments
Subject: [External] Striped Bass PID

The best way to protect striped bass is by a moratorium on the “harvest.”

Joseph F. Behot
Partner
Cullen and Dykman LLP
433 Hackensack Avenue
Hackensack, New Jersey 07601
T: 201.488.1300 | F: 201.488.6541
E: jbehot@cullenllp.com

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Comments

From: Larry Pieper <lhpieper@yahoo.com>
Sent: Friday, April 09, 2021 4:21 PM
To: Comments
Subject: [External] Striped Bass PID

Comments to Atlantic States Marine Fisheries Commission PID 7 Atlantic Striped Bass
Issue #1: Are the existing goal and objectives of Amendment 6 still in line with current fishery needs and priorities? No, we would not be having this discussion if the goals and objectives were in line with current thought. Where did the TC come up with the 15 year old fish as a marker? State fishing regulations protect age structure with slot limits. The TC needs to maintain the rules in place and revisit the problem annually. There is no constant with the environment. Many years ago, there was talk of the multi-species model to correct the malfunctioning of the single species model for striped bass at the Maryland DNR. Dr. Ed Houde was one of the experts consulted on this issue for his expertise in the subject, and he in no uncertain terms made it clear that the single species model for striped bass does not fit for stock assessment of the species. Therefore, he made clear, How do we expect a multi-species model, predator/prey, is going to fill in the missing variables to satisfy the issues stock assessment is having with a single species?
Issue #2: Biological reference points (BRPs) are used in fisheries management to measure stock status and evaluate management plan effectiveness. The current BRPs for striped bass are coastwide in nature and based on historical stock performance, and given in terms of threshold and target levels of female spawning stock biomass (SSB) and fishing mortality. Specifically, the 1995 estimate of female SSB is used as the SSB threshold, with the SSB target set at 125% of the threshold. When female SSB is below the threshold level, the stock is declared overfished. The fishing mortality target and threshold are the values of fishing mortality estimated to achieve the respective SSB target and threshold over the long-term. The 1995 estimate of female SSB is not an appropriate benchmark for determining stock status because the SSB is artificially inflated numbers due to Hatcheries which the state of Maryland and their partners operated in the eighties and early nineties to stock tributaries in Maryland. Maryland DNR went out and procured a tractor trailer tank truck in order to distribute the hundreds of thousands of fish produced at the hatcheries in Maryland. These numbers alone are not accounted for in any models the TC has been working with in the past. This data point was missed by the science; therefore, the SSB value is incorrect and overinflated the striped bass stock was an overpopulated value. The information missed is evident in the discrepancies observed between Figures 1 & 3 with the SSB for 2002, 2007and 2013. The SSB is 50m, 80m, and 125m compared to 240m, 225m, and 165m respectively. The TC has to reevaluate the SSB and determine a new benchmark to use and should be the 1993 SSB value. BRP is the longest section of this PID and indicative of how the TC has a lot more work to be done in order to achieve the mark on this issue. The TC is tasked with a very difficult problem of too many unknown variables and discussion of the “current reference points” may be unattainable given current objectives for fishery performance in your words. The PID goes on to discuss a SCAA model again your words, (SCAA) model currently used in striped bass stock assessment is unable to produce reasonable estimates for model-based reference points, such as MSY or SPR (spawning potential ratio). These ideas only compound the problem and cover the real issue which would be the TC needs to get better data points from the field and stakeholders.
Issue #3 & #4: The BRP-based management triggers require more accurate numbers in order to require action by the TC. The reference points currently used for management are based on stock conditions in 1995; the SSB was experiencing overpopulation at that time due to the hatchery input by the Maryland DNR and partners. This overpopulation lead to too many mouths to feed in the stock; emaciated fish were observed in the field by the DNR during the tagging efforts done from 1997 to 2000. Then in your own words “The latest science also indicates that the SSB target has never been reached which raises questions that it may be an unreasonably high management target given current objects for fishery performance and changing or altered ecosystem conditions (e.g., climate change, and changes in other predator and prey population abundance). What? I think you just acknowledged the whole issue with SSB. The winter trawl survey off the coasts of Virginia and North Carolina is the only effort I know of where one might be able to estimate SSB. This value is a guesstimation at best and is no way an exact value. The TC should use recruitment as a better variable achieved by the JI used at Maryland DNR and other state resource departments. Albeit, the JI is a measure of the stock to come;

these cohorts do not contribute to the stock for 4-6 years in the future. Then the PID has “Meanwhile, the recruitment-based trigger is evaluated on a 3-year cycle and has not been triggered since it was established, even though the stock experienced a period of variable, but below average recruitment from about 2005-2014 which contributed to stock declines in recent years.” I do not see this fact at all if we look at your Figure 3. The values for 2005 and 2011 rival the 1995 recruitment value of 150M age 1 fish or better. However, the values for 2007, 2009, 2013, and are below average, 2013 was the worst. If one just looks at Figure 3, the average recruitment should be around 130 – 140M age 1 fish. Ideally, a year like 2004 with a recruitment of 300M age 1 fish would be great but not a reality because the problem would be solved. Here is a puzzling point, why do Figures 1, 2, and 3 end at the year 2017 and Figures 4 and 5 end at the year 2019? Figure 3 shows a good recruitment for 2015 and 2016, the SSB may be illustrating an increase by 2019 from the 2015 JI, but we do not see the data for those years. Management trigger #1: Fishing mortality threshold should remain the same if the threshold is exceeded the program must be adjusted to reduce the fishing mortality. Management triggers #2,3,&4 should be revisited to reevaluate the female SSB in order to determine a new norm to correct for the hatchery influence from the moratorium and overpopulation of the stock. Once the female SSB has been reestablished a new target and threshold level can be adjusted to fall in line with these new values. Management trigger #5 “If any Juvenile Abundance Index shows recruitment failure (i.e., an index value lower than 75% of all other values in the dataset) for three consecutive years, then the Board will review the cause of recruitment failure (e.g., fishing mortality, environmental conditions, and disease) and determine the appropriate management action.” The Juvenile Abundance Index is probably the best indicator of a strong or weak recruitment in the future for the stock. The JI variable is ascertained through the various state resource departments and is a way to achieve a more accurate variable for the analysis of the future stock. Trigger #5 mentions “recruitment failure caused by disease” I believe this is the first I have seen or heard the TC refer to disease in this document; however, I will come back to this failure of recruitment issue in conclusions of my comments. As for the quick fix to a problem which has occurred over time with the fishery, I do not see how the TC can rebuild the stock quickly other than by reducing fishing mortality. Therefore, smaller incremental changes over time to gradually rebuild the stock would make better management practices; one cannot rush the biology of the anadromous iconic Chesapeake Bay striped bass.

Issue #5: Regional Management and statement of problem from your document, “An ongoing objective of the Atlantic Striped Bass FMP is to provide regional flexibility while maintaining coastwide regulatory consistency to the extent practical. Previous striped bass management regimes have allowed specific regions to manage their fisheries independently (under a different F rate than the rest of the coast) to balance these competing priorities”. The latter should remain the same. At present in Chesapeake Bay the states regulate the fishing regulations from your directions and at present we are allowed one fish per day and there are size limits and closures during the year. If the female SSB does not plateau soon, moratorium may be on the horizon.

Issue #6: Conservation Equivalency (CE) should not be part of the striped bass FMP; this issue should not be used and eliminated by the TC. Public comment questions for the issue clearly confuse the TC such that the system cannot be QA or QC. In your words from document, “Both CE programs and coastwide measures have variable levels of effectiveness. A CE program may provide a higher level of conservation than the coastwide measure in a state. However, it is difficult to determine if a coastwide measure or a CE program has performed better or worse due to the challenge of separating the performance of the measure and outside variables, particularly on a state level when more than one state implements a CE program”. If I read this statement correctly, one cannot determine which measure has performed better, coastwide or CE. My question now is: Why confound and confuse the process with this issue? Why not use the KISS principle here and stick with and improve Issue #5 Regional Management.

Issue#7 & #8: In 2019 scenario TC claims recreational anglers handled 31million fish (Figure 4) and took 2.15 million fish home. The remainder 28.85million fish, 2.59million fish or 9% died due to recreational release mortality; therefore and thusly, The TC is saying that 26.26million fish survive and live to see another year. TC’s answer to problem lets add more Gear restrictions. No! But wait now we’re going to talk circle hooks. Capital article (Local Newspaper Outdoor) February 7, 2021, statement made “Even if every angler and charter skipper up and down the coast and from Swan Point to Cape Henry used them perfectly and practiced exceptional release techniques, the savings to rockfish stocks is still relatively small compared to other factors. Anyone who thinks we can rebuild rockfish on mainly on the back of circle hooks is delusional”. I echo this statement; a fisheries manager cannot rely on this issue alone to bring back the stock. They used the term “compared to other factors”. What do they mean by that? Other factors, I prefer to use the term unknown variables, which there are many in fisheries management. Fisheries science is not an exact science. Ricker developed the best known tool to use in this science and science used in this context is lame at best. Statistics is probably a better term

to use. Fisheries statisticians have to deal with many so called known variables and many more unknown variables. It is the latter which have confounded these statisticians for years. In the end point for stock assessment the final variable is virtual population estimate, again a variable which is supposed because it is not exact. CPUE, Fishing Threshold, natural mortality, and recreational release mortality, the latter two are constants, are all determined by what the model generates through statistics and the numbers which are gathered from the field and input to the formula to achieve an end point. Hook and line mortality is not the problem here. Studies were done back in the late 80's at the Maryland DNR in the Chesapeake Bay and results were reported on to the U.S. Fish and Wildlife Fish Restoration program through the DJ project and presented at the Catch and Release Workshop held by VIMS and Sea Grant in 1993 in Virginia Beach, Virginia.

Issue #9: Commercial Fishery, Each state is allocated a commercial quota in pounds of fish for harvest in the ocean region. A separate Chesapeake Bay commercial quota is allocated to Maryland, Virginia, and the Potomac River Fisheries Commission per the state/jurisdiction's mutual agreement. Since early 2000s the commercial sector has used a tagging program to mark every fish harvested and taken to market. The fishery is monitored by the state and landings are recorded by the state DNR in Maryland. While collecting samples for the DNR, I came upon numerous occasions of large numbers of mortality in a poundnet situation. The net had not been fished for several days and the mortality was a result of overcrowding in the impoundment section of the net. Therefore, I have to question the mortality by commercial fisheries as PID states, "Commercial discards are estimated to account for <2% of total removals per year since 2004". Furthermore, the commercial fishery should not be managed with historical levels from PID, "The coastal commercial quotas were restored to 100% of the states' average landings during the 1972-1979 historical base period at a 28" minimum size, with few exceptions". This size of fish would be the female SSB removal whereas; the recreational fishery is a smaller fish and not necessarily a female in Chesapeake Bay.

Conclusions: The PID 7, "Atlantic striped bass (Morone saxatilis) have supported valuable commercial and recreational fisheries on the U.S. Atlantic coast for centuries. … The first Interstate FMP for the species was approved in 1981 in response to declining juvenile recruitment and depressed landings throughout the coast from Maine through North Carolina. The FMP and subsequent amendments and addenda focused on addressing the depleted spawning stock and recruitment failure. Despite these management efforts, the Atlantic striped bass stock continued to decline prompting many states (beginning with Maryland in 1985) to impose a complete harvest moratorium for several years until recruitment improved. State fisheries reopened in 1990 under Amendment 4 which aimed to rebuild the resource rather than maximize yield. The stock was ultimately declared rebuilt in 1995… the Atlantic Striped Bass FMP was adopted which relaxed both recreational and commercial regulations along the coast." Question for the TC: Does the TC think the stock rebuilt itself in five years without some sort of outside interaction? The moratorium caused recreational fishery to created a catch and release problem which the Maryland DNR started to address in 1989. The complaints were coming from the commercial sector because they were not allowed to interfere with the fishery; therefore, Maryland DNR went out to investigate hook and release mortality by aerial surveys conducted with the NRP of Maryland. Thusly, the hook and line studies (HALS) were created to demonstrate the effects of catch and release fishing. Three areas were selected in Maryland's portion of the bay to address effects of salinity and temperature. The short of a long story is hook and release mortality was not 9% as the TC has decided. Additionally, the studies led to more questions than we had answers; the HALS was just the beginning of what needed to be done. We came up with Angler Induced Mortality Studies (AIMS). We looked at everything from angler experience, rod type, line weight, hook type, bait or lure, dehookers, and handling and release. The physiology of the fish was also addressed, How long was the fish played? What levels of lactic acid build up in muscle tissue was created? What were the blood levels in these fish after being interacted with hook and line? I can go on but running out of time here. The point is that there are way too many variables to the problem.

You get into your car and drive to work only to see the Low Tire Pressure Light is lit. So, you stop to put air into the tire and off you go for a couple of days. The air temperature drops and daytime temps are 28; you get in the car to go to work and there it is again that pesky Low Tire Pressure Light. You stop and put air into the tire. Over the course of the next two weeks, you go to and from work and no problems seems to be OK. Temperatures rise and you are able to go four or five weeks and alls fine. You get into the car next day and start off to work and sure enough there it is again, that pesky Low Tire Pressure Light starring at you again. Question is When are you going to fix it? Just like the air in the tire leaking so too the FMP is missing something or several variables with striped bass. The TC needs to go back to the drawing board and revisit many of the issues here. The BRP need to be readjusted as hatcheries contributed to the SSB.

Item 1: The reference points currently used for management are based on stock conditions in 1995, the year the stock

was declared rebuilt (see Issue 2 on page 6). The biomass threshold is the level of SSB in 1995, the biomass target is 125% of the threshold, and the fishing mortality threshold and target are the levels of fishing mortality projected to achieve the biomass reference points over the long-term, respectively. The specific values of these reference points have been updated after each benchmark stock assessment based on the time series of SSB estimates. These values are wrong and the stock was overpopulated with too many mouths to feed and this resulted in many sick fish in 1995-2006. I cannot comment on present because not sure if Maryland DNR does this work anymore. This stock has been experiencing a slow and steady decline due to DISEASE caused by a pathogen Mycobacterium spp. and fisheries managers continue to ignore this problem. The human population has something very similar at present or maybe you want to not believe the fact that over 550,000 deaths have occurred due to this DISEASE Covid 19. Hello, Is anyone at Home there at the ASMFC TC? The oyster population in Chesapeake Bay has declined over the years due to two pathogens in the ecosystem and have come close to decimating the fishery. There is no mention of addressing disease in the PID for amendment 7, for adult fish, but I do see disease addressed for the JI recruitment problem. Karl Blankenship, of the Bay Journal, wrote an article on this subject back in April 2020; he interviewed Dr. Wolf Vogelbein of VIMS for the story. NOAA, USGS, and US Fish and Wildlife Service held a symposium in Annapolis back in 2006 to address the issue of Mycobacterium in the striped bass population. One presentation even addressed the issue that the disease probably has an effect on the population. This presentation was given by Dr. Desmond Kahn and Dr.Vic Crecco specifically tying the tagging study to decline in population regarding the disease. Workshop on Mycobacteriosis in Striped Bass, May 7-10, 2006 U.S. Geological Survey Scientific Investigations Report 2006-5214, 42p. Available from USGS at http://www.usgs.gov/pubprod.

I don’t think anyone wants to see history repeat itself and the travesty of Mycobacterium to continue to decimate the striped bass population. The TC needs to read this publication.
I look forward to this year coming and hope to be able to fish using the following guidelines and whatever the Maryland DNR posts as regulations for this year:
Item 2: Addendum VI, approved in 2019 in response to the 2018 benchmark assessment, implemented additional 18% reductions to fishery removals to end overfishing and again try to reduce F to the target. This required an 18% reduction to all commercial quotas (ocean and Chesapeake Bay), a 1-fish bag limit and 28” to less than 35” slot limit for ocean recreational fisheries, and a 1-fish bag limit and 18” minimum size limit for Chesapeake Bay recreational fisheries beginning in 2020.

Respectfully Submitted Comment for Atlantic Striped Bass PID 7.
Larry Pieper
Formerly Maryland DNR

Comments

From: jdev038926 <jdev038926@gmail.com>
Sent: Friday, April 09, 2021 4:17 PM
To: Comments
Subject: [External] Striped Bass PID

The current objectives seem fine in my opinion.

The 1995 estimate is alright for now but when we reach those levels again we cannot again become complacent. We should manage for abundance of large breeders and a diverse age group to ensure a healthy striped bass fishery. Instead of relaxing as we did in the early 2000's we should raise our expectations.

Rebuilding the stock quickly is more important to me than the other options, I worry we will continue this slow downslide until we end up in another moratorium.

Managing the individual fisheries like the Chesapeake in there own manner is okay assuming they err on the side of conservation, such as the Potomacs crushed barb rule. The rules should ensure a better fishery not things like relaxing slot limits because "there are males mixed in".

Plug makers, like many of us, have seen the writing on the wall and starting adding crushed/smaller barbs to their lures and only having a single belly treble hook and instead having an inline hook or just a weight.
If ASMFC leads the way, fishermen and women will follow and adapt for like they have with the new circle hook regulation.

Further regulation, or preferably banning, gill nets would be a step in the right direction in reducing bycatch for a multitude of species.

If enforcing the current regulations is costing money then I believe the fines just aren't high enough, there is no shortage of poachers.

We owe it to these fish and future generations of anglers to take this situation seriously.

Thank you all for the work you do, researching how to better manage this wonderful resource we have. I hope coming discussions are fruitful, with proper management the species has a bright future.

Regards,
J

Comments

From: Chris Dollar <cdollarchesapeake@gmail.com>
Sent: Friday, April 09, 2021 4:17 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC Members,

This thought struck me an hour after I released the glistening silvery rockfish, hurtling headlong up the Chesapeake into the autumn sunset at the end of my 30th rockfish season: *What if that was the last rockfish I'd ever catch?*

Although that's a unlikely scenario, it's not one untethered from reality. If you fished for rockfish the last time the Baltimore Orioles won the World Series (1983) then you recall the striper fishery was shutdown from 1985 until 1990. Lately I've been ruminating on the thirtieth anniversary of the re-opening of rockfish season after the moratorium, mainly because over the past decade we've witnessed a very troublesome skid of this marquee gamefish that was once heralded as a shining example of our ability to bring a species back from the brink.

Fishery biologists and managers from Maine to North Carolina as well as members of the Atlantic States Marine Fisheries Commission agree: Stripers are overfished and overfishing is occurring from Maine to North Carolina.

This precipitous slide has been gradual yet insidious: One spot after another where I once consistently caught stripers has produced fewer and fewer each season for the past seven years. Add the fact that the cow stripers are getting hammered from all sectors and the Chesapeake's young-of-the-year index has been below the long-term average nine of the last fifteen years, and trouble is not just brewing it is most definitely past the boiling point.

Reversing the troublesome decline of the East Coast's premier gamefish should be the top fishery priority for the ASMFC and its coastal states. Fishery management leaders are too aware of the tightrope we must walk between taking action to curb stripers' descent and not wrecking people's livelihoods. Rebuilding the rockfish biomass as quickly as possible is key to securing the longterm viability of our fishing economy. We entrust you and our state resource agencies with stewardship over our public fisheries, which to me means putting the health of our fisheries above politics. In recent years, that has not always been the case.

Amendment VI will guide striper management for at least the next decade. The last time the ASMFC adopted so sweeping a plan was in 2003. It is our striper road map, a huge opportunity that likely will not happen again in many of our lifetimes. Certainly most of the current ASMFC members will have rotated off the Commission the next time striper FMP comes up again. Make your time count.

True, management is no easy task to coalescing so many varied opinions. However, the recreational fishing community has been clear about what we expect from our fishery management leaders and politicians: Fairness, transparency, and taking decisive action to make the tough decisions that are in the best interest of fishery conservation. For me it simply boils down to this: I'd gladly return more rockfish to the water in exchange for more fish to catch.

Rebuilding the striper fishery is going to take years, and will require sacrifices from all stakeholders. We also need to recognize warming coastal waters, due to climate change, may be influencing migration patterns. Galactic leaps in technology—fast, reliable boats that can cover scores of miles in all kinds of weather; sophisticated fish finders; social media and text networks—have rocketed fishermen light years past where we were in terms of angling efficacy just ten years ago.

Take all of these factors together, we need to create a new, 21st century striper paradigm. That's only possible if the ASMFC takes bold and courageous action to finally put "Rockfish First!"

Below for specific recommendations, which I support wholeheartedly. Thank you again for your dedication and hard work to improve our public fisheries.

Respectfully,

Capt. Chris D. Dollar
"Stay Healthy…Go Fishing!"
Outdoor Communications & Fishing Outfitter
(410) 991-8468
Tacklecove.com

1. Fishery Goals and Objectives

- ***Manage striped bass as primarily a recreational fishery, which means manage them for increased abundance and age structure.***
- ***Balance the needs of catch and release anglers with those who like to take a fish home.***
- ***Stabilize the fishery with regulatory consistency across space and time.***

2. Biological Reference Points (BRPs)

- ***Keep the current reference points in place. Addendum VI implemented an 18 percent reduction in fishing mortality intended to end overfishing.***
- ***Those measures were put in place in 2020 and managers have not had a chance to determine if they were effective. Thus, it would be pre-mature to change reference points at this time.***
- ***Focus on maintaining fishing mortality to rebuild the stock and avoid future declines in the population.***
- ***Do not change the reference points until such time as these goal posts are generated from the stock assessment.***

3. Management Triggers

- ***Management should focus on a set of triggers that recognize a decline in abundance that so that corrective action can take place.***
- ***All management triggers considered should be tested over a previous time to determine the value of the trigger in avoiding stock declines and recognizing the value of regulatory stability.***

4. Stock Rebuilding Target and Schedule

- ***Utilize a ten-year rebuilding plan that focuses on maintaining F at its target level.***
- ***As much as possible, support improvements to water quality and habitat for striped bass.***
- ***Allow for flexibility in the rebuilding timeline if the Technical Committee determines that factors other than F have contributed to a slow recovery for striped bass.***

5-6. Regional Management and Conservation Equivalency

- ***Continue the development of a multi-stock model to improve managements understanding of stock dynamics.***
- ***Delay the implementation of regional management until a multi-stock model has been approved for management use and the stock is showing signs of recovery.***
- ***Restrict the use of conservation equivalency when the population is in a poor condition.***
- ***Implement coast-wide and Chesapeake Bay-Potomac River regulations for regulatory consistency and stability.***

7. Recreational Release Mortality

- ***Continue working with recreational fishery stakeholders through the advisory panel process to consider additional coast-wide or state based regulatory efforts.***

- ***Leverage partnerships with recreational fishery stakeholders and sport fishing businesses that focus on education and outreach to address recreational release mortality.***
- ***Prioritize funding for coast-wide and state-based education and outreach efforts developed in partnership with stakeholders.***
- ***Coordinate cooperative research efforts that can enhance managements understanding of specific recreational fishery impacts.***

8. Recreational Accountability

- ***Current limitations of recreational catch data make it difficult to measure accountability using a hard quota on an annual basis.***
- ***Use rigorous stock assessments that occur over 2-3-year intervals to assess changes to recreational catch and its impact on the population.***
- ***Explore Improving recreational catch data collection using electronic reporting and other programs supplemental to the Marine Recreational Information Program.***

9. Coastal Commercial Quota Allocation

- ***Develop methods for setting quotas and commercial allocation based on the selectivity of each component of the commercial fishery.***
- ***Take into account its impact on specific portions of the stock, e.g., harvest of SSB vs. juvenile stocks, and the relationship of harvest to spawning and migratory cycles.***

10. Other Issues

- ***Amendment 7 should develop a better understanding of habitat and environmental issues that contribute to recruitment success and failure, and consider guidance to states on priorities or actions that may achieve specific outcomes for striped bass.***
- ***Commit to investing in additional surveys to track recruitment throughout the striped bass' range, and to supplement existing indices of juvenile abundance in the Chesapeake Bay and other producer areas***
- ***Develop a stronger understanding of stock changes driven by climate change.***

Comments

From: Sam Stavis <sam@tomostackle.com>
Sent: Friday, April 09, 2021 4:11 PM
To: Comments
Subject: [External] Opinions On State Of Striped Bass Fishery

Hello,

I am emailing in hopes my voice will be heard - even just a little bit! The fishery is not in a good state, the options being considered at the moment just really do not make sense. Additional commercial days do not make much sense, considering how short we have fallen from the sets quotas over multiple seasons now. I work in the industry and see the effects first hand, the current state of the fishery is not good. These fish do not need excess pressure, even though large numbers of large bass were present north of Boston they were extremely scarce in many of their normal haunts. I think a balance of commercial fishing is always important, but more days is just bad news and an awful idea. Hope this finds you well, thank you for your time.

Best Regards,
Sam Stavis

Comments

From: Uecker <ueckers@comcast.net>
Sent: Friday, April 09, 2021 4:07 PM
To: Comments
Cc: Stephen Train; Patrick Keliher; AVID.MIRAMANT@LEGISLATURE.MAINE.GOV; Megan Ware
Subject: [External] Striped bass amendment 7

To Whom It May Concern,

Striped bass are once again in trouble and I believe we must act now to preserve and protect them so that my kids and their grand kids can experience the wonderful fishery that I've enjoyed so much in the past.

Please consider the following:

Biological Reference Points. I believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

IStock Rebuilding and Target Schedule. I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Conservation Equivalency. I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Thank you for your time and making the right decisions for our fishery!

Craig Uecker
Registered Maine Fishing Guide
Certified Fly Casting Instructor

Comments

From: Michael Bryand <mrbryand@gmail.com>
Sent: Friday, April 09, 2021 4:04 PM
To: Comments
Subject: [External] Public Information Document for Amendment 7

I am writing to give my comments on the PID for Amendment 7 to Interstate Fishery Management Plan for Atlantic striped bass.

I will only be commenting on the issues that seem most important to me.

Issue 2: Biological Reference Points.

I believe its incredibly important to keep the Biological Reference Points at the 1995 level.

Issue 4: Stock Rebuilding Target and Schedule

I believe the10 year rebuilding timeline should be maintained.

Issue 5: Regional Management

With the stock at 25 year low and data is not available for stock specific or regional management, I recommend removing this issue from consideration.

Issue 6 : Conservation Equivalency
Conservation needs to be coast wide and not state to state.

Issue 9: Commercial Allocation

I believe the Commercial Allocation needs to be updated to better reflect the current fishery. Using data that is 50 years old is out of touch with todays fishery.

In closing, I am not a Commercial fisherman or a Registered Guide. I do not make any money off Striped Bass. I am an avid angler that is lucky enough to be able to enjoy this great fishery with my two children. My son who is 12, is fanatical about striped bass. He ties his own flies and wakes up at 3;30 am and rides his bike to a local river to fish. He constantly talks about being a Registered Maine Guide and starting his own business as soon as he's old enough. My fear is if this fishery is not managed appropriately, and the stock is not brought back to exceptable levels he may never have a chance at his dream job.

Thank you for consideration of my comments.

Sincerely , Michael Bryand

Comments

From: Jason Dutremble <jaydu19@gmail.com>
Sent: Friday, April 09, 2021 3:58 PM
To: Comments
Subject: [External] Striped Bass PID

Dear ASFMC Council,

My name is Jason Dutremble and I am a recreational fisherman from southern Maine. If my understanding of the ASFMC is correct, your job is to first protect the fishery and secondly worry about the fishermen/economy. If you let the fishermen govern this there would be an abundance of catch/mortality similar to what has happened with other species that weren't properly managed and are now still struggling to recover. In this case, business would be booming for a few years (maybe even a decade or more) but eventually it will dry up and we'll all be forced to stop fishing for striped bass altogether.

Every chart, graph, article, etc. that I have come across shows that the striped bass population (specifically breeder fish) is on a steep decline. What that says to me is that we need to take action now and manage this while we have a chance. It's a lot easier to take effective steps now than it would be to react after the damage is done and try to recover.

I think this stock needs to be better managed uniformly up and down the east coast. To strengthen the stock, there needs to be a temporary hold put on the ability to keep these fish. I understand that economically this would put a short term damper on commercial fishermen (but I'm sure they have plenty of other target species to keep them going). I'm sure in the long run this would pay dividends to all (including commercial fishermen). Please take the necessary time and action to let this stock rebuild and become healthy again!! Remember to take charge and manage this fishery -- not be managed by a bunch of commercial fishermen (or better yet some stakeholders on Wall St).

I'm available for further discussion at any time.

Thanks,

Jason Dutremble

Comments

From: Joe Gugino <joe.gugino@gmail.com>
Sent: Friday, April 09, 2021 3:58 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Comments on the PID for Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

To Whom It May Concern,

My name is Joe Gugino and I am a recreational angler based out of Winthrop, MA.

I am a passionate Striped Bass fisherman, who wants to make sure that Striper population is healthy enough for the future for us all to enjoy it.

I think it is everyone's responsibility coast wide to make sure they do their part and fight for the protection of Striped Bass.

In general I believe a moratorium would be beneficial, 1 fish limit 35 inches + coast wide, or a higher slot limit of 34 - 40 inches. But in regards to the PID please see my comments below.

My goal in commenting is to do my small part to help ensure a future that includes a healthy striped bass population and fishery, and please see my thoughts below on the specific issues brought up in the PID.

Issue 1—Goals and Objectives: The current goal and objectives for the fishery are sufficient, and I recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Thank you,

-- Joe Gugino

Joe Gugino
29 Billows St.
Winthrop, MA 02152
(860) 402-5903

Comments

From: Dan Buckley <daniel.l.buckley@gmail.com>
Sent: Friday, April 09, 2021 3:50 PM
To: Comments
Subject: [External] Amendment 7 to the Striped Bass Interstate Fishery Management Plan

Hello,

The primary reason I was able to move back to my home state of Massachusetts is due to recreational opportunities for fly fishing for striped bass. I previously lived in Montana with my long-term partner who was a guide working in the Montana fly fishing industry. She was unwilling to consider moving to Massachusetts before experiencing the saltwater fly fishing community and recreational saltwater fishing economy. A sustainable population of striped bass is the critical underpinning that supports both the salt fly fishing community and economy.

I am a strong believer that managing fisheries for an abundance of fish provides the best outcomes for the economy and ecosystems. Since moving back to MA I have spent $1,000's at local fly shops and my partner has worked in the fly fishing industry locally. I have these comments regarding Amendment 7.

- I believe that 1995 is an appropriate reference year. Failure to maintain fish populations is NOT a reason to lower the biological reference points.
- I believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. A rebuilding plan for striped bass should be revised and expanded to protect the striper populations that by many metrics are in decline and danger.
- I believe that the issue of recreational release mortality is important and should be revisited once the Massachusetts Division of Marine Fisheries has completed the ongoing multiyear study to assess the impacts of various fishing methods and gear types on striper post-release mortality.
- Due to the uncertainty that Conservation Equivalency adds, I believe that it should only be considered when the striper populations are not overfished.

Striped bass conservation is an issue that is very close to my heart and family. Please do not hesitate to reach out with any questions.

Regards,

Dan Buckley
Cambridge and Bourne, MA

Comments

From: Jeff C <jwcarson99@gmail.com>
Sent: Friday, April 09, 2021 3:48 PM
To: Comments
Cc: stripercomments@gmail.com; 2021striperPID@gmail.com
Subject: [External] Striped Bass PID comments

My name is Jeff Carson, and I'm a recreational fisherman that lives in southern Westchester County, NY. I fish primarily in LI Sound and the South Shore of LI, and I appreciate the opportunity to share my comments. Overall, what I would like to see is a plan that focuses on conservation and rebuilding the stock per Amendment 6.

In answering the overall question, "How would you like management for stripers to look in the future?", I would like to see the fishery managed for abundance, as I think it's good for all of us if that's the case...better for locals, better for businesses, better for the entire economy built around recreational fishing. I want to be able to recommend to friends who are visiting from other parts of the country that they spend the money on going out with a guide.

More specifically, I'd like to see the following:

- Goals and Objectives should remain unchanged; I'd like to see better adherence by the Management Board.
- The Biological Reference Points should remain unchanged; I think 1995 is the appropriate year, and I'd like this be removed from consideration from Amendment 7
- With regard to Regional Management: these are migratory fish, so I think it would be more effective to manage the fishery as a whole and I think that the idea of Regional Management should be removed from consideration.
- I would like to see Conservation Equivalency done away with – it allows other states to game the system and leads to overharvest
- With regard to Recreational Release Mortality, I'd like to see better education and outreach to anglers to teach them techniques for releasing fish safely. If the science is there, I'd be in favor of requiring that we pinch our barbs if it reduces recreational mortality.
- I'd also like to see better enforcement. I see people poaching fish in the Bronx with impunity, right off the same road where if I pull my car over and put my hazards on to check out the fishing, I'll get a ticket. You have NYPD, you have NYC Parks vehicles all over the place, but you can just whack fish and lay them out in the grass next to the road and no one says anything. The fact that people are willing to do that tells me that there's simply not enough enforcement, so I'd like to see better enforcement.

    - A couple of other things:
        - I'd like to see the fishery managed in a way that is fair to all stakeholders; if it were up to me alone I would be in favor of a 10-year moratorium, but I don't think it's fair to all stakeholders so I'm not in favor of this idea.
        - I'm not opposed to a tag system to lower recreational harvest,
        - And something that I've seen work well in freshwater fisheries out West is strong protections and restrictions on targeting spawning fish, and I'd like to see something similar here.

Thanks so much for the opportunity to share my thoughts.

Best,
Jeff Carson
303.915.0730

Comments

From: Potvin, Brian [MCCUS] <BPotvin@ITS.JNJ.com>
Sent: Friday, April 09, 2021 3:50 PM
To: Comments
Subject: [External] Striped Bass Amendment V11 Commentary Massachusetts

I would strongly encourage the group to take steps to reduce the number of striped bass being killed. I think both recreational and commercial fishermen should undertake a marked reduction in allowable take. While my preference would be for a moratorium on the killing of striped bass altogether for a period of a few years, I acknowledge the varied interest groups' pressure make that unlikely. So, for commercial fisheries, I think the number of fishable days should be dramatically reduced and there should be a maximum size of 32 inches of keepers so that the breeding females can do their thing. I think rec fishermen should be allowed one fish per person per day (max of four per boat per day) with a size slot of between 26 and 28 inches.

The stock is in tough shape and we should act aggressively to stem the erosion of this important natural resource.

Brian Potvin | 978.778.0586
83 Green Street | Marblehead, MA 01945

Comments

From: grethelindemann@aol.com
Sent: Friday, April 09, 2021 3:44 PM
To: Comments
Cc: grethelindemann@aol.com
Subject: [External] Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
1050 N. Highland St, Suite 200A-N Arlington, VA 22201

By email:comments@asmfc.org
Subject line: Striped Bass PID

I am a Virginia native who grew up fortunate enough to enjoy the bounty of the Chesapeake Bay, and many activities it offers from fishing, crabbing, boating, and more.

I became an award-winning NASA engineer, then pursued doctoral studies in neuroscience at Johns Hopkins, to ultimately become an entrepreneur "from scratch" -- meaning to make any sort of living I must live in the "real world" now, far far from any ivory tower.

To do what I do I adapt the scientist perspective with an insistence on simplification, along with a willingness to change in order to make things not just work, but work very well.

I am keenly interested in seeing to the vitality into perpetuity of our magnificent Bay, and all its riches. This very much includes all the wonderful lifeforms it holds.

I appreciate having this opportunity to offer my comments as a member of the public touched by the fishery and marine issues at hand.

The health of the Bay -- and making it the healthiest it possibly can be -- are paramount.

To accomplish this requires seeing to the health of our fish and other marine populations, and their vital sustainability.

I see the problems facing almost all our regional marine life now -- and particularly the striped bass -- as being that of increasing, ultimately catastrophic mortality, the origins of which are largely traceably and simply human caused.

To curb and reverse this mortality I suggest:
1) Taking the urgent near-term step of imposing a one-or-more years' moratorium on fishing, without exception.

Beyond that, I see the following being included in the necessary solutions:
2) All steps to continually improve the health of the bay. This is multifold, and I defer to the scientists for identifying the steps all of us, from private citizen to business and agriculture, and governments, must adopt and practice.

3) ELIMINATE Catch-and-Release. Now and forever. I realize the controversy and sure "push-back" on this suggestion, but it is essential, and I expound on it below.

4) Support through education, funding, and regulation if/as needed the above changes.

Regarding Catch-and Release:

Catch and Release is not sport. It is an appalling opposite to true sport.
It is the sanctioned brutalization, torture, and/or murder of innocent sentient creatures. Worse, as seemingly sanctioned by "adults" – it trains young minds that such behavior is acceptable. Such behavior, when sanctioned, spreads to horrific behaviors that hurt other innocents, from animals, to humans, to our planet overall.

Beyond and irrefutably: Catch and Release renders meaningless any well-intentioned other catch or size limits (by size or quantity).

Those fish released – of whatever size – are at the very least seriously damaged, and may never be able to resume viable lives. Whether they live or die, they then become open for disease/failure to thrive – which DOES occur – and in so doing increase by infection or contamination through their sick exudation would-be healthy specimens of their own species or other. The perpetuation of unhealthy and disease states of species and the environment multiplies. Mortality increase is unavoidable in such a scenario.

As horrific as this picture – this reality – is, it can be simply ended by ceasing forever Catch and Release.

The argument that businesses supporting the activity (tackle, gear, boating, charter, etc.) will be irreparably hurt is a foolish groundless one. As time marches on, so too must business adapt. The sporting industry offers myriad possibilities for replacing actual catch and release with technologically satisfactory and fun replacement (e.g., through virtual reality in arcade or at-home settings, etc.) with the possibility of venues making such a family activity far more accessible to more people (and lucrative to business). Businesses can prosper far beyond, and sustainably so, what they do already by ending Catch and Release. The individuals then properly respectfully trained to fish can do so in due course to catch – if at all – for sustenance alone.

****

Thank you for considering my comments. I know the individuals to whom this is directed care deeply about our marine wonder, and whom I trust will do the right thing. The needed steps are not easy and they take courage. I and others will support such moves to the utmost, I assure you.

With sincere thanks,

A. M. Lindemann
5201 Studeley Ave
Norfolk VA 23508
grethelindemann@aol.com

304-312-4723 (Cell)

Comments

From: Nicholas Christy <npchristy@earthlink.net>
Sent: Friday, April 09, 2021 3:34 PM
To: Comments
Subject: [External] Striped Bass PID

To Whom it May Concern:
I live in New York and do the majority of my fishing in Rhode Island. I've been fishing for stripers for 50 years.
I keep 1 or 2 fish for the table per year and release the rest. I fish almost exclusively for stripers. They are dear to me.

Desperate times call for desperate measures. A moratorium worked before and will work again. The fishery should be restored before it utterly collapses. Tweaking things around the edges will only serve to prolong a lean season where nobody will be happy. The slot limit was a good idea but should have been put in place long ago. The time-line is too slow.

If the dice are rolled and we go with something short of a moratorium, aggressive measures must be implemented to protect the stock. A Striper Stamp, as has been suggested, similar to Florida's Snook Stamp, could generate revenue for enforcement of existing regs. and angler education to decrease mortality rate of fish released.

Commercial Regulations should be revisited.
Poaching and illegal sale must be addressed.

Thank You. Please protect these fish.

Nicholas P Christy

Comments

From: Surfrat 888 <rlombardi313@gmail.com>
Sent: Friday, April 09, 2021 3:34 PM
To: Comments
Subject: [External] Atlantic Striped Bass PID

To whom it may concern:

As a fisherman for 30 years, I am writing to you to express my concern with lowering SSB thresholds. These should absolutely not be lowered. The problem with your management plan is that it CLEARLY FAILING, striped bass should be managed for abundance and not maximum yield. This is an outdated and backwards way of thinking. It is my position that striped bass should be given a break, there should be no harvest for a period of a couple years to allow for recovery for the beneficial use of all sectors. Let me be perfectly clear, the ASMFC has completely failed to protect the striped bass, and as such you have failed both the recreational and commercial sector. You are flirting with a collapse of this biomass and if that happens I can assure you that those responsible will be held accountable.

Sincerely,

Robert Lombardi
Westwood, NJ

Comments

From: shawn boisclair <shawnboisclair@gmail.com>
Sent: Friday, April 09, 2021 3:28 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Striped Bass Management amendment

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

RE: Comments on Atlantic Striped Bass Amendment 7 Public Information Document

Dear Ms. Franke and Atlantic Striped Bass Management Board:

Good afternoon,

I got introduced to striper fishing as a young kid in Newport RI, fishing from the rocks and points in the 70's, I saw some excellent striper years but then it turned and stripers became a much rarer fish to catch. Then real conservation measures were put in place and the stocks rebounded. Sadly the populations seem to be going in the wrong direction again and this requires action and sacrifice from both the commercial and recreational side of the fishing community.

Please take the needed actions to return the striped bass fishery to a healthy and sustainable base. Safeguard not just the striped bass but the various species that make up the food chain.

Recreational fishermen such as myself contribute a large number of dollars to numerous small businesses including tackle and bait shops, charter boat operations and numerous other business restaurants, manufactures, etc. The sport also helps support Federal and State environmental agencies and their enforcement units who look to protect the resource, provide services to the citizens and enforce the laws we the people enact through our government.

Please let science rule the day, be cautious we any changes that aren't fully supported by the facts and keep the 10 year plan stays in place

I want to continue to enjoy Striper fishing, pass it down to my kids and have those great memories of the incredible fish.

Thanks

Shawn Boisclair
91 Donbray Road
Sprijngfield MA 01119

Comments

From: James Goodhart <jgoodhart56@aol.com>
Sent: Friday, April 09, 2021 3:24 PM
To: Comments
Subject: [External] Striped Bass Comment

Dear Commissioners,

Striped bass are overfished and being overfished. Changing (lowering) biological reference points will not improve the health of the stock and would further damage the health of the fishery. The prudent move would actually be to raise the thresholds, rather than lowering them. Each time the threshold for a healthy spawning biomass has been exceeded over the last 20 years, the harvest has been increased and the stock has crashed in short order. We need to learn from our past mistakes and adjust management practices accordingly. Conservation equivalencies are a management shell game to create more harvest, and they damage the prospects of a timely recovery. If the management objective is stock recovery, why would managers implement policies that undermine that objective? Managers should implement policies that remove the hurdles that serve as obstacles to recovery. Some low hanging fruit would be to eliminate the gill net harvest of juvenile fish, another would be to eliminate the commercial harvest of large breeding females.

My business depends on your management decisions. The long term goals of building a healthy and abundant stock must be prioritized. Transparent science based management needs to prevail. The gamesmanship of the fiefdoms, that seeks to gain advantage over others on the council, needs to be uprooted and eradicated.

I look forward to the the time when a healthy and abundant striped bass fishery is a reality, not a dream!

Sincerely,

James

Capt. James C.Goodhart
Shadowcaster Charters
56 Boardman St.
Newburyport, MA 01950
(978) 463-7755
www.shadowcastercharters.com

Comments

From: Kenny Jewkes <jewkes48@gmail.com>
Sent: Friday, April 09, 2021 3:17 PM
To: Comments
Cc: 2021striperpid@gmail.com
Subject: [External] My input

Hey my name is Ken, and I am writing you to share my thoughts on striped bass management. This fishery is incredibly important to us. It should be managed for abundance!!! We should Not be increasing the amount of days for commercial fishing. If these numbers cannot be hit by these skilled fisherman then there is a clear problem. And it's not lack of skill it's lack of fish. The amount of money that these fish bring to these small towns is incredible. We could have a fishery that people would travel around the world to fish in and bring all of the east coast states revenue. But at this point I just want my future kids to be able to enjoy something that brings me so much happiness. But at this rate they will have to settle for stories..
Thank you for your time! Ken

Comments

From: B <b.kostraba@gmail.com>
Sent: Friday, April 09, 2021 3:17 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Hi Emilie,

I appreciate the opportunity to provide comments on the Amendment 7 PID. Striped bass are one of the most important recreational fisheries along the east coast. They are one of the only saltwater species that everyone has a story about. This is a fishery that everyone from Maine to North Carolina wants to see have record numbers and sized fish for generations to come.

The current amendment process offers both promise and concern - it could restore the currently overfished striped bass stock to health and sustain a valuable resource or permanently reduce striped bass abundance and expose the stock to greater risks in the future. For the benefit of all stakeholders, please consider the health and abundance of the striped bass stock as a primary goal.

In order to achieve that, please advocate for the following during the amendment process:

- The management plan's current goals and objectives should not be changed.
- The current biological reference points should remain in place.
- The current management triggers and stock rebuilding schedule should remain unchanged.
- Management actions taken by the ASMFC when management triggers indicate action is needed.
- When all aspects of the issue are considered, there is no reason for Amendment 7 to treat release mortality any different than any other source of fishing mortality.

This fishery brings not only food to many throughout the eastern seaboard of the US but also provides economic, social, and recreational benefits too numerous to count. Managing the population of striped bass to provide a sustainable population of every class of bass will benefit all parties.

Thank you,
Britt
--
Britt Kostraba

Comments

From: Rob Wofchuck <robwof@gmail.com>
Sent: Friday, April 09, 2021 3:15 PM
To: Comments
Cc: dhw@cisunix.unh.edu; Cheri Patterson; RITCHIE WHITE
Subject: [External] Comments on Amendment 7 to Management Plan for Striped Bass

Dear all. Thank you for all your efforts to protect the striped bass. I am an avid recreational fisherman and love to fish for striped bass. I live on the Seacoast of NH and often go out myself and with guides. Please protect this valuable resource so this critical recreational species stays around with a healthy population.

With regard to Amendment 7, the goals and objectives seem fine and should remain as they are written. Additionally, I believe that the 1995 biological reference year is appropriate and that these two items be removed from further consideration.

Furthermore, I strongly believe that the current 10 year plan for rebuilding the population in Amendment 6 is appropriate and be maintained and that the rebuilding plan for striped bass take place as soon as possible.

I do not like the idea of conservation equivalency. This seems to bring in too much uncertainty, especially when we are trying to rebuild the population. Please remove this option until the fish stock is no longer overfished.

I also encourage further outreach and education on recreational fish mortality rather than incorporating into the regulations now. We all can do a better job and further education is always helpful.

Thank you again for putting so much time and effort into saving this incredible valuable recreational opportunity. Now more than ever, these outlets for us to get outside and enjoy nature are even more important. Now is the time to protect the striped bass for us and all future generations.

Respectfully submitted,

Robert Wofchuck

Brentwood, NH

Comments

From: Sean Layton <seanrlayton@gmail.com>
Sent: Friday, April 09, 2021 2:57 PM
To: Comments
Subject: [External] Striped Bass PID

To whom it may concern:

I am an avid surf and boat fisherman for Striped Bass based in Monmouth County, NJ. I am writing to urge action to protect Stripers and to persuade you to release publicly the info you collect from this and all requests for comment.

The management of the future of this fishery is crucial on East Coast both from an economic perspective and ensuring fishing as a sport continues to be a part of life. Without Stripers, dollars, jobs and quite frankly, a way of life, will be lost as we know it in many coastal areas.

From 20+ years as a recreational angler, I have enough experience to tell you that 2021 is an inflection point for this species. Anecdotally, though this is mostly supported by data, AS a result of climate change, Striped Bass (SB) populations are showing up earlier than ever in places like the Raritan/Hudson and migration patterns of these fish have changed from a traditional spring/fall run to and from spawning grounds down south to inshore/offshore during different parts of the year. Despite this mounting evidence, very little has changed to offer these fish protection at key ages and at key times throughout the season.

While some changes have been made to regulations - circle hooks, a cap on trophy fish (which I applaud) - more needs to be done to accurately protect this fishery in the long term while ensuring fishing can continue unaffected in the short term.

Suggested action would include:
- Revise size and bag limits to protect fish over 30" who are mature and full of eggs in the spring, also allowing anglers to take home smaller fish that are more prevalent in the fall
- Enact closed seasons between spring and fall migrations, esp. when other target species are prevalent and "in-season" during summer
- Opportunity to expand fishing into the EEZ/federal waters in light of new data that shows Hudson spawners migrate to the canyons, alleviating pressure on the "resident" inshore population

Please take this into consideration. Many thanks!

Sean Layton
732.300.7271
seanrlayton@gmail.com

Comments

From: PGS <brian@pattersonguideservice.com>
Sent: Friday, April 09, 2021 2:55 PM
To: Comments
Subject: [External] Striped Bass PID

Committee Members,
As owner and operator of Patterson Guide Service, fishing charter business based in Portsmouth Rhode Island, I am expressing my opinion on the Striped Bass situation. Full disclosure, I am also part of the RICPBA but do not share in the majority viewpoint.

I am in full support of a 100% catch and release program for both recreational and commercial fisherman. The current situation does not give us the best future outcome. M business has been 100%catch and release for 3 years now and has actually increased in revenue. We are educate clients on the striped bass situation and offering alternatives to table fare (species more abundant in nature).

Thank you,
Brian Patterson

Comments

From: c bayliss <cbayliss70@yahoo.com>
Sent: Friday, April 09, 2021 2:48 PM
To: Comments
Subject: [External] Striped bass

To whom it may concern,

I love striped bass and I am an avid fly fisherman so I only catch and release. I spend a lot of time on the water, either on boat or shore, I look forward to the spring, summer and fall so I can go for these noble fish. There has been a significant decline in the striper population and I feel like the only way to bring the population back up is by a strict moratorium on commercial fishing on striped bass. You can't expect a fish that's population is on decline to have any kind of recovery without strict management. Everyone in my fishing community talk about how important these fish are to them and it would be an incredible loss to not protect stripers at this sensitive juncture.

Please don't let there be an extended commercial fishing season. These fish need more time to recover. I fear without that, we could lose a national treasure.

Thank you for listening,
Chuck Bayliss

Comments

From: Adam Shapiro <adam.h.shapiro@gmail.com>
Sent: Friday, April 09, 2021 2:50 PM
To: Comments
Subject: [External] Striped Bass PID

Hello,

My name is Adam Shapiro. I am a commercial and recreational fisherman from Connecticut currently living in Maine along the Piscataqua river. I would like to share the experience of catching striped bass with my children one day and I hope to see the population of the fish grow.

I do not understand why we can not set our goals even higher. In Maine, we do not allow hunting in the fall on Sundays. The Commercial tuna fishing season is strictly based on quotas. There are more strict measures we can take to give the fish an even greater chance to thrive.

The cape cod canal is a major highway for fish. It is manmade and acts as a gauntlet for the fish to swim through. It is the best fishing from shore in New England for a reason, and it is not natural.

I hope to see fishing along the canal limited greatly or abolished altogether.

Anywhere where manmade formations along the coast have created an unfair advantage to the angler by creating an unnatural confluence of striped bass should be restricted from fishing.

I also believe that limiting the number of days/week which fish can be taken to keep or release recreationally should be limited until we have surpassed our original threshold goals.

Limiting the impact on commercial fishing and chartering and connected businesses should remain a priority throughout this. The common fisherman out enjoying the fishing season seems to be the greatest threat to the population and needs to be held accountable.

I do love to see an increase in the love of fishing, but with so many more people out fishing, especially because of the pandemic this past year, please limit the number of hooks in the water at one time. Let’s give them a chance to thrive.

Thank you

Adam Shapiro

Comments

From: jzackari@yahoo.com
Sent: Friday, April 09, 2021 2:39 PM
To: Comments
Subject: [External] Striper regulations

Good afternoon noon. I grew up fishing for rockfish in southern MD and have noticed the horrible decline in numbers and size of fish. I hate the bias of dnr heavily policing recreational angkers but commercial anglers are able to have extended seasons/limits. While I am just an average fisherman I do believe keeping breeder size rockfish 30" and above should not be allowed. I hope to implement a slot size of 18-28". I say 28 so no one can make the excuse of keeping a striper 29.8 inches and just rounding it up to 30.
Some stats say recreational anglers keep 3x more that commercial fisherman and we all know thats a lie. We cannot compete with miles of nets not catching/injuring fish of any size. I also think commercial fishing should be more sustainable such as hook and line. Commercial fisherman arent fisherman. They are businessman and business doesn't care about the ecosystem and its future so business shouldnt be on the water. I love our fishery and I believe that true anglers love it enough for it to flourish.

Comments

From:	Adam Wiles-Rosell <awilesro@gmail.com>
Sent:	Friday, April 09, 2021 2:41 PM
To:	Comments
Cc:	Stephen Train; miramant@legistlature.maine.gov; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT
Subject:	[External] Striped Bass management

Good afternoon and thank you for allowing the public to comment on the management of striped bass on the East Coast.

Regarding the Public Information Document for Amendment 7, here are my thoughts:

Issue 1:

I feel that the current goals and objectives outlined by issue one should be **included** in Amendment 7 and implemented. On all accounts the goals and objectives listed makes complete sense for an eternal lasting fishery.

This should be removed for further consideration.

Issue 2:

1995 should be considered the appropriate reference year. As a 28 year old who has only being fishing for striped bass for 3 years, I have not had the good fortune to really know what "the good ole days" were. However, I have heard stories about when you could not find a striped bass in Maine as well as the stories about their prolific return. We can not refute the evidence at hand and wouldn't it make sense to try and build something back up and maintain "the good ole days" for future generations. Which would also have economic benefit for the State of Maine - ie: more guided fishing trips, more sales at gear shops, more hotels being rented for travelers looking to recreate in our State as well as others along the East Coast.

This should be removed for further consideration.

Issue 4:

Stock rebuilding should certainly be considered and I am in favor of the 10 year rebuilding plan from Amendment 6. For the reasons listed above in issue 2, I see this as being necessary to implement as soon as possible.

I would like to also let it be known that I am in full support of the American Saltwater Guides Association and their position regarding all Amendment 7 Issues.

As a recreational angler I would like to say that I would gladly put my rod and reel up for any given amount of time if it meant that this amazing fishery would bounce back to numbers of the past - so long as rules were established to maintain the target

numbers. To me, this fishery is more important as a game fish, than table fare. I personally feel that giving the Striped Bass game fish classification would be the most beneficial. Without substantial knowledge, my assumption would be that the local restaurants, hotels, outdoor equipment stores, and guides would benefit more from a strong fishery than commercial angers would in an adverse way.

Lastly, it is my hope that these fish are here for me to teach my kids how to angle for someday. Sadly, I have my doubts. Here is to hoping I am proved wrong.

Thank you for hearing my thoughts.

Appreciatively,
Adam Wiles-Rosell
Saco, Maine

Comments

From: Matthew Hoagland <mhoagland1397@gmail.com>
Sent: Friday, April 09, 2021 2:32 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External]

It's really very simple. Do what's best for the long term health of the striped bass population. It will benefit commercial and recreational fishers as well as the entire ecosystem.

Ignore the politics. Don't move the goal post to create the appearance of achieving a goal. Embrace real science.

It's really very simple.

Thank you.
-- Matthew Hoagland
Plymouth, MA

Comments

From: Parker Gerrish <gerrish.parker@gmail.com>
Sent: Friday, April 09, 2021 2:36 PM
To: Comments
Cc: Megan Ware; Patrick Keliher; Rep. JAY MCCREIGHT; stripercomments@gmail.com
Subject: [External] Status of the Striped Bass

Dear Atlantic States Marine Fisheries Council,

My name is Parker Gerrish and I am a recreational angler from Maine. Having watched this fishery decline over the years has been difficult and I'd like to have thought that I've done my part by releasing every single striper I've caught over the past 10 years. I went to school in hopes that I could further do my part to help these fish survive by trying to get a better understanding of water quality through the study of environment science because at the time this is what we were told was the issue with why these fish were struggling.

What I learned in my education was that focusing on the larger picture. Then I watched the board shift their focus and realize fish mortality was a serious issue along with forage. But what I've witnessed in the more recent years has sickened me. You did nothing to help these fish with your last amendment/law changes. It proved to us all that money is more important than keeping this fishery at a sustainable level. You let everyone including your peers down.

Although I would like to see it put to end I know commercial fishing won't just stop. What I would like to see is rule changes to protect these fish for longevity. Put a temporary ban on the taking of these fish and let it recover. It's that simple. To help the big picture, you need to remove a link in the chain to keep the fishery alive.

Please don't let me down!

Thank you,

Parker Gerrish

Comments

From: John Fullam <jfullam@svpglobal.com>
Sent: Friday, April 09, 2021 2:26 PM
To: Comments
Subject: [External] Striped Bass PID

Hi Emilie. First off, I commend the Atlantic States Marine Fisheries Commission for initiating this request for comment, as updates to the current regulations are well overdue. As a striper fisherman (Connecticut and Cape Cod), I can attest to the fact that the striped bass population is way down (fewer catches, fewer sized breeders, etc.), as compared to 10+ years ago (sadly, so has the bluefish population). As such, to prevent further destruction of this fishery, I personally believe new regulations need to be implemented and it needs to happen immediately.

Although I am not a marine biologist, I think it's safe to assume that the following factors have contributed to the overall decreased striped bass population: a) pollution (fertilizers, etc.); b) overfishing; and c) overfishing of breeders. I will not going into my thoughts on pollution; however, with respect to overfishing and the overfishing of breeders, I believe you should be looking into the following issues:

A) How is it there are different regulations for commercial fisherman and recreational fisherman? Specifically, size limits? We need the breeders to ensure healthy future populations.
    a. Honestly, I think you should think about taking striped bass off of the "menu" altogether (make it a game fish only – a moratorium for at least a few years, to see how the population reacts).
B) How is it there are different regulations for each state along the Atlantic? The states need to coordinate their efforts – having different regulations for each state is maddening (bag limit, size, etc). For example, to require circle hooks in MA; however, to not have the same requirement in RI or CT was insane. We are all in this together – we all need to play by the same rules to ensure future sustainability.
C) I'm constantly blown away by the disregard for the current rules – the states need to coordinate fines for disobedience (taking prohibited sizes, taking more than allowed, etc.) and those fines need to be increased. Treat the fines as though you are dealing with an endangered species (for the individuals catching and the places purchasing the illegal fish) – doing so will certainly "help" remedy poor behavior. Further, use those fines to increase resources for research, education (of the population), enforcement, etc.
D) The use of circle hooks is a GREAT idea; however, circle hooks should be required whenever you are targeting stripers, or targeting fish that school with stripers (eg: blue fish). How can the circle regulations be properly enforced if people are allowed to say they were targeting a different fish (eg: bluefish), as opposed to the stripers they are gut hooking (and were actually targeting) with j-hooks?
E) Stop commercial fishing of bunker! As previously mentioned, not only is the striped bass population down, the bluefish population has been non-existent!
F) Limit the net fishing!

Again, I don't want to point the finger, as we are ALL in this together; however, I personally think you need to take a long hard look at commercial fishing. Further, on the recreational front, I believe you need to impose very strict fines on disobedience.

Thanks,

John

Comments

From: Ethan Lucas <ethanylucas@yahoo.com>
Sent: Friday, April 09, 2021 2:17 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; stripercomments@gmail.com
Subject: [External] Striped Bass PID

ASMFC,

First and foremost thank you for taking the time to read my comments regarding striped bass management.

I am strongly in support of maintaining commercial fisheries for striped bass - that being said - there are many improvements needed for both commercial and recreational sectors and some apply to both.

I have outlined below the major themes that should be considered as part of this and future management improvements to rebuild the east coast fisheries and as you will notice my personal bias and knowledge base is towards the Massachusetts fishery.

MA Commercial

- Stricter regulations are needed to determine who can access a commercial permit for striped bass. It is a well-known phenomenon that the majority of the 'commercial' fleet consists of recreational fisherman masquerading as commercial fisherman ('recremercial') and this needs to be solved. One way would be to increase the cost of a commercial license to act as a disincentive.
- Vessels/Residents from other states shouldn't be allowed to fish commercially for striped bass in MA waters and have their catch go towards the MA quota. If this can't be changed - drastically increase the license cost for out-of-state vessels/residents to act as a disincentive. We should be looking to maximize the value of the fishery, not flood the market and drive the price down.
- The State should not look to increase the number of commercial days if the allotted quota is not projected to be met. The science is clear that the population is overfished and overfishing is occurring - it is the quota that should be revised downward.
- The State should move to prohibit commercial fishing in the Cape Cod Canal. It is well-known that rampant poaching exists there.
- At this time 35" is an acceptable length for this fishery. Should the stocks rebuild I would advocate for a 34" limit but no lower.

MA Recreational

- The slot limit should be revisited in a couple of years to see if it is working effectively. The moratorium from the 80's and early 90's with a 36" length contributed greatly to the rebuilding of the stocks. There is a chance that with such a great amount of recreational pressure put on the age classes comprising the slot limit that we could effectively fish those classes out.
- Avoid the urge/pressure to keep on adjusting lengths within the slot limit for the time being. Let's find out how many fish are making it through the gauntlet and breeding successfully before adjusting.
- If we are truly serious about understanding the amount of recreational catch, a reporting system should be implemented. This could be done as an "endorsement" to a saltwater recreational fishing license. If you don't report, you don't get your striped bass endorsement the next year.

Leftovers

- To the greatest degree possible the regulations should be harmonized for all states participating in commercial and recreational fisheries. If we continue to let certain states use commercial methods other than hook & line (e.g. gillnets), take recreational fish as small as 16', and take varying numbers of fish, these actions will continue to undercut the self-restraint and sacrifices made by fishermen in more northern states.

- Draggers fishing in state and federal waters but not targeting striped bass continue to have documented instances of large striped bass bycatch that are dumped overboard. This absolutely needs to be solved. One way would be to mandate they report the catch, allow them to sell the catch, but also incur heavy penalties for exceeding a certain annual limit - similar to what is done for other groundfish species.
- All of this needs to be paired with increase enforcement at the individual state levels. Without adequate resources dedicated to stamping out poaching, these efforts to improve management and compliance will be undercut.
- Lastly, open channels for discussion with the buyers, distributors, and consumers of commercially caught striped bass. These are valuable fish and there should be a financial incentive for commercial fishermen to take care of their catch to the greatest degree possible. This would result in higher prices to the fishermen and a better quality dining experience for the end-consumer.

Sincerely,

Ethan Lucas

Comments

From: James Patterson <pattersoneng@gmail.com>
Sent: Friday, April 09, 2021 1:58 PM
To: Comments; TOM FOTE; C. LOUIS BASSANO; HEATHER CORBETT; Adam S. Nowalsky; ERIC HOUGHTALING
Cc: stripercomments@gmail.com; Dave Slater
Subject: [External] Striped Bass Amendment 7 PID Response

To Whom It May Concern,

My name is James M. Patterson, I am a professional civil engineer, and I live with my wife and two children in Fair Haven, NJ. I fell in love with striped bass fishing when I was only 7 years old. My father would take my younger brother and I fishing on the beach and the banks of our local estuary near where I grew up in coastal Massachusetts. Those early experiences stand out in my memory clear as day. The excitement of that first tug, the awe of holding the beautiful chrome and striped powerful fish in my hands; and the gratitude one feels when the fish is released to swim another day is all really something special. Fishing for striped bass is a passion many continue throughout their lives and that is no different for me. 32 years later and I am still chasing these fish up and down the coast. It is a school of constant learning. I have adapted based on my experiences and the lessons learned. My father and I have come full circle. I've traded in the bait tackle I learned from him; and have even now been teaching him to fish with shore casting plugs. These fish challenge us, they get us outside in all hours of the day/night, to new locations, sometimes in good conditions, most often not. The pursuit of this fish is a need that many must fulfil. The striped bass recreational fishing industry is a thriving economy and rightly so. I myself, have multiple rods/reels/plugs for various conditions, locations, season's, etc. I make a conscious effort to support small business by purchasing from local shops rather than online and form big business. I've hired local fishing guides to teach me new strategies and take me places by boat that I can not access by foot. I hold season fishing passes at Island Beach State Park and Sandy Hook every year. I work very hard professionally, I've got money to spend, and I want to spend it on striped bass fishing. I release every fish I catch, because I love this fish. I am diligent about learning as much as I can about striped bass. I do this because I want to share this passion with my children like my father did with me. These fish take you places you would not otherwise go. It makes you aware of your surroundings, the environment and the animals and fish that live in it. Tying knots, hiking, licking wounds. This is not staring into a television screen, it is tangible, physical, and challenging experiences. As long as these fish are healthy and thriving, there are many lesson's to learn and memories to be shared for generations to come. If we do not act now to protect and preserve this most beloved American coastal targeted recreational species they could be lost for ever, along with the economy and culture that comes with it. My recommendations are as follows:

- #1 I recommend the goals/objectives issue be removed from consideration for inclusion in Amendment 7. The goals/objectives are not the problem, but instead the fact that the SBMB has not followed them the past 10 years.
- #2 1995 is the appropriate reference year. I recommend that the Biological Reference Points remain unchanged and that this issue be omitted from consideration in Amendment 7. Lowering the goalposts can not be justified by SBMB's failure to maintain a healthy striped bass stock.
- #3 I believe the four mgmt triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass mgmt. I believe it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but may not be an appropriate indicator of such a failure.

- #4 I strongly believe the 10 year rebuilding timeline currently specified in Amendment 6 should be maintained. I am also strongly in favor of developing a rebuilding plan for Atlantic striped bass as part of Amendment 7.
- #5 Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional mgmt, I recommend omitting this issue from further consideration in Amendment 7.
- #6 I believe Conservation Equivalency (CE) should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the mgmt process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.
- #7 I recommend the efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.
- #8 The issue of recreational accountability is a complex challenge that applies not only to striped bass, but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. I recommend removal of this issue of recreational accountability from further discussion in Amendment 7, except as it pertains to accountability for states that implement CE.
- #9 Re: commercial allocation, it appears that the landings period used for allocation, which dates back to nearly 50 years, is woefully out of date. I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.
- #10 I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future mgmt discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, which could ultimately inform stock-specific mgmt.

Thank you for taking the time to consider this plea. Please do the right thing.

Sincerely,

James M. Patterson, P.E.

Comments

From: Bob Campbell <bobcampbell2010@gmail.com>
Sent: Friday, April 09, 2021 1:47 PM
To: Comments
Subject: [External] Striped Ball PID

Thank you offering the opportunity for input on the Striped Bass Draft Amendment 7 Public Information Document.

As an "elder" among fishing folks, I've lived and fished through many of our striped bass cycles, from the 80's bust through the 90's apparent recovery, up until the current crisis situation these great fish, and therefore we, face. And having lived, worked and fished in Massachusetts, Connecticut, New York and now New Jersey, I think I've seen a broad swath of regulatory measures, mostly reactive vs. proactive, mostly commercial fishing biased.

I understand that. My dad's business went under and he and we had to find other work. People need to support their families. I don't think we should speak lightly about making stripers a gamefish off-limits to harvest. But it's what we clearly must do to save this great treasure, and guarantee the revenues from sport/boat/surf fisherpeople who recreationally catch and release stripers, in the form of tax dollars from meals, motels, gear and guides. Revenues for our states that far outweigh what commercial fishing nets (no pun intended.)

So I ask you to please put in place a moratorium now against striper harvesting. I ask you to ban commercial fishing for stripers and implement strong penalties for "recrommercial" and fully commercial harvest. And I ask you please to guarantee to commercial fisherpeople that your Commission will seek help for them through other state agencies, to support their transition to harvesting other species but not stripers.

Thank you for considering my thoughts and requests here, I appreciate your willingness to hear input.

Bob Campbell
Holmdel, NJ

Comments

From: Jason Melecio <jm5696@yahoo.com>
Sent: Friday, April 09, 2021 1:42 PM
To: Comments
Subject: [External] Atlantic Striped Bass PID

In regards to Stripers,

My name is Jason Melecio, I am a fisherman. First of all, I just want to say thank you for all that you do and have done, your job is not easy. It is difficult to make decisions that impact so many people. Please consider investing in our fish and our culture.

It is my thought that it is time for us to think and invest in the future of our friend the Striped Bass. We must consider how difficult and hard it would be to place a moratorium on the species, but when you invest you do so for the future. Too often governing bodies make decisions that just keep people happy, but making people happy may not be what's best for our future.

A moratorium guarantees a bright future and for the ability to have a thriving population, this is what we have to strive for. The state of the fish is not good, and people who are saying differently are being short-sighted. A thriving population of fish allows for all parties to have a future!

I know a decision like this would be really difficult to make, but please consider it. As a soon-to-be father of two, I want our future generation to experience the Striped Bass. Please consider a moratorium to create a thriving Striper population.

Thank you for your time,

Jason Melecio

Jason Melecio jm5696@yahoo.com 516-242-6087

Comments

From: Dan Parma <parma81@hotmail.com>
Sent: Friday, April 09, 2021 1:37 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] striped bass

ASMFC,

I am a recreational angler that cares about the future of our beloved striped bass.
I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass **as soon as possibl**e.
I also think rec anglers should go through some kind of educational video or training to explain the importance of handling the fish with caution and how to properly release a fish after its caught.
I think with some knowledge and understanding of the current issues, We can come up with a mandatory safety course for all anglers, New and old.

fund/incentivize bait and tackle shops so they can host events for the general public, Or have them do a online course and be a requirement for fishing license .

Show people the benefit of using circle hooks and single hooks on lures, I think education and understanding is the best way to ensure our future fishery.

I also recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

I trust that you will take my comments into consideration and appreciate your effort to save our striped bass population.

Thank you much,

Daniel Parma
Danvers Ma.

Comments

From: Thomas Woessner <twoessner91@gmail.com>
Sent: Friday, April 09, 2021 1:35 PM
To: Comments
Subject: [External] Striped Bass Regulations

To whom it may concern:

After fishing for striped bass for twenty years I can safely say this stock is in trouble. We need to take action to have tight regulations down the coast to make sure we are not depleting class sizes. The striper is synonymous with east coast fishery and the way it is being managed is unfortunate. Let's work together and have a clear focus for the striped bass. Tighter regulations and less "keeping of fish" both on the commercial and recreational side. Striped bass are worth more to our economy and ecosystem alive than on a dinner plate.

Please feel free to reach out with any questions. Thank you for your time.

Best,

Thomas Woessner

Comments

From: Matt Boutet <mattboutet@gmail.com>
Sent: Friday, April 09, 2021 1:34 PM
To: Comments; stripercomments@gmail.com
Subject: [External] Amendment 7 comments

I'm writing from Maine so I've been sending comments to the ASMFC and attending meetings for 20 years now. I've watched the slow decline of the fishery over that time, and I'd love to see the ASMFC do what's best for the fish and the fishery this time around.

On the specific issues up for comment, I'm mostly just going to repeat what the American Saltwater Guides Association has put together (see below).

Issue 1—Goals and Objectives: I believe that the current goal and objectives for the fishery are sufficient and recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: I continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: Given the history of CE in striper management, I think this should be acknowledged as a failed experiment and removed from consideration.

Issue 7—Recreational Release Mortality: I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. This should be a distant second to efforts to reduce harvest.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7.

Issue 9—Commercial Allocation: I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. I also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

Matt Boutet
Biddeford, ME

Comments

From: Matt Bacchi <mbacchi@gmail.com>
Sent: Friday, April 09, 2021 1:25 PM
To: Comments
Subject: [External] Striped Bass Amendment 7 comments

Hello,

I'd like to comment on the Striped Bass Amendment 7 to the Fishery Managment Plan process.

ISSUE 1: Fishery Goals and Objectives
The goals and objectives should stay as is. You need to rebuild striped bass stock as required in Amendment 6, as it was declared overfished nearly 2 years ago. Focus on fixing the problem.

ISSUE 2: Biological Reference Points
The 1995 estimate is a valid benchmark, do not change the female SSB targets. Fix the problem before you move the goalposts.

ISSUE 3: Management Triggers
Leave the management triggers as is for now.

ISSUE 4: Stock Rebuilding Target and Schedule
Leave the stock rebuilding target and schedule as is for now. Work on a plan to rebuild the stock as soon as possible.

ISSUE 5: Regional Management
Focus on rebuilding the stock, not on fracturing your resources defining regional plans. Do not change your model to a regional management architecture.

ISSUE 6 Management Program Equivalency (Conservation Equivalency)
Conservation Equivalency should only be instituted when the striped bass population is fully rebuilt. No states should be using this method until the stock is rebuilt.

ISSUE 7 Recreational Release Mortality
You should not change your focus to do anything about Recreational mortality, unless you also consider commercial mortality. Do you have a stated plan to address bycatch from commercial fishermen? This is also a problem.

ISSUE 8: Recreational Accountability
RHL is not something to be focused on at this time.

ISSUE 9: Coastal Commercial Quota Allocation
Yes, perform analysis to determine a better benchmark for commercial quota.

Issue 10:
I believe it is prudent and highly important to consider climate change in future striped bass research and management plans.

Thank you.

Matt Bacchi
Amagansett, NY

Comments

From: Robert Groskin <rgroskin@gmail.com>
Sent: Friday, April 09, 2021 1:24 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7

April 9, 2021
Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke;

With the striped bass stock at a 25 year low, I hope the ASMFC would consider NOT change any of the goals that were defined in Amendment 6, that the Biological Reference Points remain unchanged including the 10 year rebuild time frame and include this in Amendment 7. I also hope the Commission would NOT develop a regional fisheries management plan until further scientific data is available.
The whole issue of Conservation Equivalency is a loophole for States, such as New Jersey, to alter the mandates from the Commission and States that do not meet the mandated requirements should be held accountable, otherwise the regulations become a farce.
As a recreational fisherman, I try to adhere to the best practices of catch and release. However more outreach and education is needed if a reduction in mortality is to be achieved. While I understand the difficulties in assessing recreational data collection, this demographic does account for a significant catch rate and those States that do use conservation equivalency should be required to provide this data.
Fishing has value to humans, understanding all the various factors that influence recreational fishing is critical to being able to promulgate effective regulations. I would hope the Commission would support research into further understanding in this critical area.
Thank you
Robert Groskin, DVM

Robert Groskin, DVM, *Executive Director*
Association of Avian Veterinarians
PO Box 9 |Teaneck, NJ 07666, USA
720-458-4111 ext 1 | Fax 720-398-3496 | E-mail rgroskin@aav.org
Find us on Facebook at www.facebook.com/aavonline

Comments

From: Angry Fish Gallery <angryfishgallery@yahoo.com>
Sent: Friday, April 09, 2021 1:17 PM
To: Comments
Subject: [External] STRIPED BASS

To whom it may concern -

Regarding recreational striped bass management, we should protect the breeders. The most effective way to achieve this is via the SLOT FISH. Continue this policy. It worked with redfish down south.

Stay the course.

Tom Lynch

Tom Lynch
Angry Fish Gallery LLC
624 Bay Ave
Point Pleasant Beach, NJ 08742
t: 848.241.2744
e: angryfishgallery@yahoo.com
www.AngryFishGallery.com

Comments

From: Michael Behot <michael.behot@gmail.com>
Sent: Friday, April 09, 2021 1:13 PM
To: Comments
Subject: [External] Striped Bass Conservation

Hello,

Since the late 90's I have witnessed the steady decline of the the east coast's striped bass fishery starting with an outstanding fishery down to a shadow and joke of what it once was. I implore you to take every conservation measure possible to help these fish. I don't want my three year old daughter thinking these were the good old days. Also please do something about CE. States like MAryland have used it to likely make things worse in the last year.

Mike Behot

Comments

From: Matthew Walsh <Matthew.Walsh@lawrence.k12.ma.us>
Sent: Friday, April 09, 2021 1:10 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Public Comments

Greetings Members of the Atlantic States Marine Fishing Commision,

I am a long-time recreational fisherman from Northshore Massachusetts. I write to you this day to communicate the grave concerns I have related to the significant and well documented reduction in the Atlantic Coast Striped Bass Biomass. As the overseeing body charged with striper management for the Atlantic States, I am requesting that you act now in a manner which aims to protect as well as replenish the stock. Moving forward, I will see this best achieved by implementation of the following actions:

1) That the established 1995 Biological Reference Points remain unchanged
2) That the ten-year rebuilding plan, specified in amendment six, remain unchanged
3) That pending the outcomes of further scientific studies, regional management of the species is not considered at this time
4) Given the concerning status of a dwindling Striped Bass Stock, that petitioning Atlantic states are not permitted conservation equivalency. Moving forward, if states are permitted conservation equivalency that they be held fully accountable if their regulations fail to meet conservation objectives
5) That the commission focus on the development of educational programing and outreach which aims to teach the public of appropriate fish handling and catch and release practices
6) That the Board work with the Technical Committe to place a 10-year moratorium on both the commercial as well as recreational harvest of the Striped Bass.

I am requesting that the Atlantic States Marine Fishing Commission not only consider but establish and further adhere to the above stated actions. I request this with the intention of an honest pursual in conservation as well as the respectful management of a species that once again finds itself of the brink of collapse.

In the Name of Morone Saxatilis,

Matt Walsh, M.Ed, CAPS, LMHC
Massachusetts

Comments

From: Greg Cahill <gregnorthfork@gmail.com>
Sent: Friday, April 09, 2021 1:05 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7

I'm writing this e-mail to appeal to the ASMFC to protect striped bass from overfishing. I have been fishing for this great gamefish for over 40 years. I have seen the stock of striped bass disappear to extremely low numbers in the past and I am afraid we are about to re-visit that period again. Striped bass are in trouble. Triggers set by the ASFMC to rebuild the stocks have been ignored. Why? What are you waiting for? More delay is going to prolong the problem and take longer for the stock to recover. For once, put the fish's welfare as paramount otherwise both recreational and commercial fishing will suffer. Healthy fish stocks will ensure healthy rec and comm industries. Don't let the striped bass be another failed fishery that is managed by the ASFMC. The reputation of the ASFMC for successful management of the fish stocks under their control is abysmal. Don't let further mismanagement of striped bass add to your record.

Comments

From: Matthew Butcka <mbutcka@gmail.com>
Sent: Friday, April 09, 2021 1:05 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7

Hi,

I am an avid striped bass fishermen, targeting the in CT, NY, and RI. Fish numbers have plummeted in recent years. There are smaller numbers of fish in fewer locations. I firmly believe that the baseline biological reference year should be 1995, that the 10 year rebuilding timeline should be maintained, and states using conservation equivalency need to be held more accountable when their regulations do not produce the desired catch reductions.

Best regards,

Matthew Butcka
mbutcka@gmail.com
(860)917-0192

Sent from my iPhone

Comments

From: Nicolas Kvasnovsky <nicolas.kvasnovsky@gmail.com>
Sent: Friday, April 09, 2021 1:01 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Amendment 7 PID

I was born in 1983 and grew up in Maryland. My passion for fishing started on Saturday morning watching Spanish Fly, Roland Martin, and whatever show that had fish or fishing on it at 4 or 5 years old I was mesmerized. I asked my father to take me fishing he looked at me like I was crazy despite the fact that he himself fished his whole life off and on. I didn't take long before I got my first spinning reel and started fishing in my creek or practiced casting in my back yard. I grew up like a lot of people and viewed fish as food primarily. It didn't take long for me to realize after going fishing over the next 30 years across the world that the amount of actual fish was precious. My neighbor up the street from me was a former Captain who had fished out of Solomons Island Maryland.So when he invited me on fishing trips in the mid 90's I got to see Rockfish(Striped Bass), Bluefish, Spanish Mackerel, and Menhaden so thick you could reach out and grab one. These blitz's or schools were the size of several football fields it was mesmerizing to see the frenzy. I learned about the Moratorium in Maryland and conservation. By the end of high school I would join one of my best friends and go fishing in Montaulk. We were lucky to work as mates on a commercial fishing boat for hook and line slot sized striped bass. Occasionally we would

hook into overslot fish that were over 50 inches. The bigger the fish the more enamored I became with Striped Bass(Rockfish). Flash forward to 2021 and the state of the fishery is a shell of what it was. This fishery is managed poorly because of the fact that it's not treated as an entire ecosystem. Every state on the Atlantic Coast has different rules and regulations for commercial and recreational fishing. This outdated system needs to be changed furthermore we need to move on from treating Striped Bass as this never ending population of fish. Every year we make an excuse or just punt the problem down the field. Now we are trying to protect the last "big biomass" which are all these fish basically up to 26 or so inches. I have listened to the American Saltwater Guide Association, CCA, and many other fishing groups and they are all concerned about the future of our fishery. The M word is scary and sad for recs and coms clearly no one wishes this. We wish for a bountiful sea full of treasures however it looks like metaphorically we keep going to the well despite seeing that it's low and not looking for new answers instead. We have done little investment into Mother Nature and have been destroying it since industrialization in the early 20th century. Heck the amount of illegal Gil netting and other practices that were socially acceptably until the early 70's is in a pdf on Maryland dnr website. Doesn't take a scientist to see that when you add pollution to genocide that you end up with an ecosystem in shambles. I apologize if this is too long of a comment and I want to be optimistic. Why do we treat trout and largemouth bass differently? We accepted the fact that

if you killed them all you couldn't catch any so why is it so different in saltwater? Look I am for harvesting and would like to see a way for this country to maintain its great fishing. I look at what Florida has done regulation wise and see some positives. At the end of the day our "pyramid" is out of whack and we all know it. As the years went by and a fish over 28 inches now is considered a rare catch especially if you fish from shore wherever that is. We need our politicians to step up and make changes for the fishery to change. We can do so many positive things from building artificial reefs, more oyster farming, working with Pennsylvania and their farmers about runoff. The list goes on and on. The elephant in the room is omega and their outdated practices. There is so much more money to be made by having the fish in the water and not killed than there is the way we have been doing it for the last 70 years. At the end of the day subsidize anyone commercially to keep their nets out of the Chesapeake bay. We did this for farmers before. My point is that it's 2021 and it's time for people to realize that if we don't change the way we eat fish there won't be many around and what will be left will be far less diverse. Also I by no means believe that their should be a moratorium. Small changes can make a big difference. Take for instance the spring "trophy" season the idea that we are dumb enough to kill fish before they spawn is stupid let alone keeping the big breeders that don't taste good in the first place. As recreational fisherman we are too good at fishing especially if the person believes in keeping every legal fish they can whether they actually even eat it is

another story. Striped bass retails anywhere from $8.99 per pound all the way up to $28 per pound. I would love to know how much striped bass goes to waste every year. It's no wonder that today we are left with so few larger fish because of economics. A commercial angler has an incentive to get the most pounds which is typically done by catching larger fish. The recreational angler looks at the fish with that same economic vision. Most people have a hard time rationalizing quality over quantity and here we are today arguing over what should be done. It's pretty easy for me to realize that we should keep young fish and let the big ones go to spawn. It so much fun catching a large fish and with today's cellphones a picture does all the bragging needed so for those that still want to keep they should be allowed to harvest a few in the fall that are up to 25 inches.

Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into

the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9—Commercial Allocation: We recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10—Other Issues: We recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers. as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

I agree with America saltwater guide association

Nicolas Kvasnovsky
959 Melvin Road
Annapolis Maryland 21403

Sent from my iPhone

Comments

From: hansen <hubbin2000@optonline.net>
Sent: Friday, April 09, 2021 1:00 PM
To: Comments
Subject: [External] Stripe Bass

Catch and release only! That's the way I feel!

Comments

From: OutCast Lures <jeff@outcastlures.com>
Sent: Friday, April 09, 2021 12:56 PM
To: Comments
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; Patrick Paquette; Douglas M. Amorello
Subject: [External] Amendment 7 PID

To the full board,

We are writing to provide our perspective on the current Amendment 7 to the Striped Bass Interstate Fishery Management Plan as a manufacturer of fishing products targeting Atlantic sport fish.

Our business literally lives or dies by the availability of a heathy and well managed biomass of saltwater species. We encourage our users to practice "keep 'em wet" C&R and to abide by all regulations in an effort to stem the current trends in species loss.

We are aligned with the American Saltwater Guide Association, and concur with the recommendations they have proposed regarding the Amendment 7 consideration.

- We believe that **1995 data remains an appropriate biological reference year**, and any alteration to this targeting baseline will dilute or render inert ongoing efforts to manage the striped bass biomass.
- We understand the need for evaluative triggers to anticipate or initiate biomass threats or other "loss" indicators. We would strongly encourage further **re-consideration to the value of the trigger 5**, based on "recruitment", due to its inherent variability and historic fluctuation. While any trigger may be beneficial in long-term management strategies, tying management decisions without ancillary insights may lead to inadvertent limitations to future policy actions.
- We strongly believe that the **10-year rebuilding timeline** currently specified in Amendment 6 should be maintained. In addition, we are strongly in favor of **developing a rebuilding plan** for Atlantic striped bass as part of Amendment 7 and take action on that plan immediately.
- Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, **we encourage removing this issue from further consideration in Amendment 7.**
- The use of **Conservation Equivalency** as a tool for management assessment in times of threatened biomass is fraught with potential for inaccuracy and can further inject negative results or dilution of conservation objectives. Regions or states that elect to implement a CE based management plan should be held responsible for damage inflicted to the biomass as a whole as a result of any such failing.
- Recreational release mortality could be seen as a significant threat to the biomass. Please continue to fund and support research on the topic and explore methodologies to inform the recreational angler on best practices and standards. Future engagement of regulatory mandates may be justified once ongoing research indicates its value.
- We would like to see commercial allocation assessments be based on updated biomass calculations. Further, increased restrictions to commercial participation may need to be explored to reduce "weekend warrior" commercial licensing. While we do not have definitive recommendations on implementation of such, it is an open secret that a significant portion of licensees fall into a demographic atypical of commercial harvest professionals.

Finally, though not a part of the Amendment 7 scope, we would strongly encourage robust strengthening (on a Federal level?) of fines and other prosecution tools for violators of sport fishing regulations and game laws. Understanding the limitations inherent in state's rights, we would encourage ASMFC providing recommendations to all state legislative bodies on the importance of such regulatory policies.

Jeff Adams
jeff@outcastlures.com

www.outcastlures.com
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#OutCastLures
#OutCastThemAll

Comments

From: Steve George <nightstrikes@comcast.net>
Sent: Friday, April 09, 2021 12:42 PM
To: Comments
Subject: [External] Striped Bass PID

Short & Simple. > Make Striped Bass a Gamefish or a 3yr Moratorium on the species up and down the entire mid Atlantic and NE coast if you're serious about protecting and preserving this fishery for the future.
And someone needs to stop New Jersey from continuing to target both large and small fish -all they care about is how many they can harvest every year and get away with with the CE nonsense that allows them take full of vantage of a ridiculous system and get away with political BS yearly *Banning the commercial fishery In Massachusetts is also a good starting step in the right direction, think about it ☺
Thanks
SteveG
Sent from my iPhone

Comments

From: Liam Rosati <liam.rosati@gmail.com>
Sent: Friday, April 09, 2021 12:37 PM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Franks,

AMENDMENT 7 TO THE INTERSTATE FISHERY MANAGEMENT PLAN FOR ATLANTIC STRIPED BASS

The last new plan amendment to the Fisheries Management Plan was Amendment 6, in 2003. The population has decreased drastically in the 18 years since then, and we're way overdue in addressing it effectively. The 2018 Benchmark Stock Assessment brings some serious issues to light, so an amendment was proposed to the Atlantic Striped Bass Fishery Management Plan to deal with 9 issues. I'll explain each of these issues and include the comments I've submitted to ASMFC. I attended the online hearing on the evening of March 24 and spoke of my concerns. I'll include the basics of that, also.

The issues to be dealt with are detailed in the ASMFC document at this web address, if you'd like to see the complete document: http://www.asmfc.org/uploads/file/60...b28uY29tIn0%3D
I'll summarize them below for those who don't want to read 30 pages. My replies are in italics.

ISSUE 1: Fishery Goals and Objectives
The goal is basically to manage the migratory striped bass stocks to maintain a broad age structure, self-sustaining spawning stock and to protect their essential habitat. These are all critical in maintaining a healthy fishery. The document lists the objectives that they developed to help them to attain those goals. ASMFC, and some user groups, question the present validity of those goals and objectives, since the striped bass population has changed greatly since they were implemented in 2003.

My statement: The goals and objectives from Amendment 6 are valid tools for effectively managing striped bass, if fisheries managers actually work toward those goals. Merely stating your goals isn't doing the job, working to reach them is. The goals and objectives should be left as they are, it's the neglect of those goals and objectives that needs to change. We've waited too long without taking action to correct the problem, let's get on it.

ISSUE 2: Biological Reference Points
These are measurements of stock status used to determine the health of stock numbers. They include the target levels, which are the numbers we're striving to reach. Another is the threshold. When the spawning stock biomass (sexually mature females) drops below the threshold the stock is considered overfished. Some user groups claim that the current reference points are outdated, and that the target is no longer attainable, and thus must be lowered. In effect, they're saying that it'd be too hard or impossible to bring numbers back to that level, so we should set that target population number lower and make it easier to attain.

My statement: I can't even believe that there is actually a proposal to lower the bar. As if Issue 1 wasn't a big enough copout. If you're neglecting working to reach your goals and objectives, how can you say they can't be

reached? If I used this way of thinking I'd say that I can have all my students achieve an A+ average, just by changing the grade of A+ to anything scoring a 50% or above. And I most certainly would not lower my standards to make them fit the lowest performing students. Biologists haven't said that the stocks can't be raised to the levels they were at in 1995. There has been absolutely no evidence to back that falsehood. If we lower the bar, we'll forever be hoping that ASMFC will put some effort into bringing numbers up to that underachieving status, just like we've been hoping for with the existing target biomass for the past several years. Please ignore any recommendation that we lower the bar. If your children's school proposed to improve your children's education by lowering the bar, would you think that was a good idea?

ISSUE 3: Management Triggers
These are based on the biological reference points and surveys of yearly spawning success. If any of these triggers are tripped, the Board must update the management process to allow the goal and objectives fo Amendment 6 to be reached.

My statement: Leave the management triggers where they are. Keep your finger off the trigger, unless you wanna kill the fishery.

ISSUE 4: Stock Rebuilding Target and Schedule
This gives a time schedule by which certain actions must be taken, and objectives reached. These were developed to make the Board accountable for keeping to it's purpose of keeping our fishery in good shape. Some believe that these are outdated, based on changes in SSB, and that the "shorter timetables for corrective action" are contradictory to stable management practices. In short, it seems that they are wanting to lengthen the time periods within which they must recover the fishery.

My statement: Stick to the 10-year rebuilding timeline. Moving the timeline back would only delay action that is needed now to get the stocks back in shape. Every year lost is a lot of money lost to our economy not only in commercial fish sales, but in the huge economic contributions of the recreational striped bass fishery. Tackle shops, manufacturers, guides and charter captains, hotels, motels, restaurants and many other businesses depend on striped bass fishermen.

ISSUE 5: Regional Management
The entire Atlantic striper fishery is currently dealt with as a whole. We know that there are several different breeding populations (and different genetic stocks) along the coast, such as those in Chesapeake Bay, Delaware Bay, the Hudson and Kennebec Rivers. The ideal situation might be to manage each stock independently, based on the yearly recruitment situations, natural and fishing mortality and age distribution of that particular population. The Chesapeake and Hudson populations did have some separate rules under Amendment 5 (adopted in 1995). Addendum iV to Amendment 6 (2015) brought them back to management under one single F rate (Fishing mortality reference point). Some people say that this method isn't consistent with properly managing the Chesapeake stock, which some say is comprised more heavily of male fish than females. They do, though, account for effects on the coastwide fishing mortality from harvesting smaller fish in the Chesapeake, Delaware Bay and the Hudson. They want "regional flexibility while maintaining coastwide regulatory consistency to the extent practical".

My statement: We need to rebuild now, not watch businesses and fishermen suffer as ASMFC tries to build new management structure that depends on techniques that are not yet available, such as differentiation of separate breeding populations by genetic analysis to manage local stocks separately. That's coming soon, but let's not come up with more reasons to delay remedial action. Please keep this issue out of Amendment 7. The assumption of mostly male fish in Chesapeake Bay should be backed up by data gathered and analyzed in scientific studies if it is to be referenced in policy-making. Let's stick to facts. Facts are supported by data.

ISSUE 6: Management Program Equivalency (Conservation Equivalency)

This allows individual states to substitute their own methods of providing the same F (fishing mortality) rate as alternatives to the regulations recommended and approved by ASMFC. Thus, states may propose their own closed seasons, minimum harvest lengths or slot limits and/or bag limits. This is based on different "fishing cultures and priorities" making agreement on one set of coastwide rules difficult. Once adopted, those CEs usually become the standard baseline from which to manage those local fisheries.

My statement: When stocks are in need of rebuilding as seriously as they are now, at their lowest point in 25 years, it is not a good time to grant flexibility to states to come up with their own plans. If some states protected fish above 35" while others protected fish below 35" in a migratory species, the whole population gets fished and none are protected. We've had states continue to overfish stocks that were supposedly being rebuilt by using conservation equivalencies, and not have to pay back the difference. Equivalencies might be appropriate with healthy and stable stock levels, but let's not play around with that when the situation is seriously precarious, like now.

ISSUE 7: Recreational Release Mortality
It's been recently determined that recreational catch and release mortality is a very significant part of overall fishing mortality. The figure they've accepted was from a 1996 study that included results from tweaking many variables, and reported average C&R mortality at 9%. The math puts that at about 2.8 million released and dead each year. During the last 3 decades, recreational fishermen have released about 90% of their catch, due to regulatory restrictions (bag limit, size restrictions,…), leading to significantly more dead stripers than those harvested. Whether the fish are harvested or die after release they still have the same effect on the number of fish left alive. The current system uses bag limits, but not catch and release mortality in managing the fishery. This is something they'd like to address. The new circle hook regulations now being implemented are part of that effort.

My statement: This is a normal factor. A good percentage of recreational fishermen choose to harvest few or no fish, but some die after release due to the stresses of being played and landed. Education on proper release techniques can help fishermen learn to fight fish quickly enough to minimize buildup of harmful cortisol and lactic acid, minimize handling time and air exposure and proper reviving through increasing oxygenation before release. Numbers that still don't make it can take the place of recreational fishing harvest of years past. Such education is the best way to handle this issue. I do support the use of circle hooks for live and dead bait, such as livelining menhaden or fishing live eels. Justin Davis has a great understanding of this issue, and his ideas are sound.

ISSUE 8: Recreational Accountabiliity
The commercial fisheries are regulated through state commercial quota allocations and size limitations, area closures, gear restrictions and other management tools. States monitor the commercial harvest through reported landings and dealer reports that are disclosed on a daily or weekly basis. When the quota is expected to be filled, the fishery closes. Overages are subtracted from the next year's quota by poundage. The recreational fishery is managed with size, bag and season limits but has no quota system. Harvest and release mortality vary from year to year, influenced by many variables. Data on recreational harvest are collected through the MRIP process, which uses mail surveys and interviewing anglers on the shore or the docks. Data is compiled to formulate estimates in two month "waves" (intervals). It takes about six weeks after a wave to calculate the estimates, so regulatory adjustments can't be as prompt as with the commercial fishery. It's difficult to accurately assess the number of fish recreationally removed from the stock by harvest and release mortality, and thus difficult to assess whether overages occur in the targeted allotment. This makes it hard to manage the recreational side of the fishery.

My statement: This is a much larger issue, endemic to management of all species, that is valid and needs to be addressed, but it'll take much more than can be addressed here at this time. We need to move now on rebuilding

the striped bass to a more robust SSB in a timely manner, and can't afford to wait, bogged down by an issue as large as this. Let's put this aside for another conversation of its own
.
Addendum to my comments on recreational accountability, by Charles Witek
George R. Baldwin Don't disagree with anything that you said. except for recreational accountability, which I think is a key to the rebuilding plan--after all, if they put a plan in place, and anglers exceed the fisihing mortality level needed to rebuild, rebuilding won't happen. It's actually pretty easy to do. Set a recreational harvest limit, then set a recreational harvest target 10% lower, to account for management uncertainty (coastwide PSEs are just below 10% most years). The limit and target change every year, maintaining the appropriate fishing mortality rate in the face of a changing biomass. Craft regulations designed to achieve the harvest target, not the harvest limit. That way, if you exceed the recreational harvest limit, not just the target, it means that the regulations need to be changed to prevent overfishing; if you just exceed the target and not the limit, it could just be normal variations in the data.

ISSUE 9: Coastal Commercial Quota Allocation
Species management boards for species such as black sea bass and summer flounder (fluke) want commercial harvest allocations to be updated to account for recent changes in catch and population distribution. The commercial fleets of each state are allocated a quota consisting of a portion of the allowable striped bass commercial harvest for the year. Chesapeake Bay has its own commercial quota, divided among Virginia, Maryland and the Potomac River Fisheries Commission by agreement between those entities. Quota overages for each state are subtracted from next year's quota, but unfilled quota from one year can not be transferred to the next. The quota allocation is determined by the harvest from each state during the 1972-1979 time period "and assuming a 28" minimum size". Chesapeake Bay and Delaware Bay have a different system, "allowed for producer areas". The ocean (excluding Chesapeake Bay) often harvests less fish than the quota permits, due to Connecticut, Maine, New Hampshire and New Jersey not having commercial fisheries for striped bass, though they share about 10% of the ocean region's allowable quota. North Carolina, with 13% of the ocean quota, hasn't had any harvest since 2012, probably due to changes connected with climate change. This led to even less of the quota filled.

My statement: The data from the 1970s is suspect as to reliability, due to harvester reporting not being required and some selling fish in other states making accuracy of state estimates sketchy at best. Population distribution is very different since that decade, between 40 and almost 50 years ago. There are other complications with the commercial quotas, also, making allocation complicated.
Commercial allocations must be adjusted to account for changes incurred in the striped bass population distribution since the 1970s, such as climate change and warming waters altering forage, striped bass habitat and range, and migration patterns. And this will need to be done on a continuous basis as these variables continue to change.

Regards,

Liam Rosati

Comments

From: Joseph Gagliardo <jgagliardo.jr@gmail.com>
Sent: Friday, April 09, 2021 12:28 PM
To: Comments
Cc: Emerson Hasbrouck; Maureen Davidson; Sen. TODD KAMINSKY; James Gilmore; stripercomments@gmail.com
Subject: [External] Striped Bass Amendment 7 Comments

Hello,

As an avid striped bass fisherman, I would like to extend some comments on the proposed Amendment 7.These fish are in a serious decline and action ***must*** be taken.

Here are a few things I thought I would highlight in reference to the PID.

-I believe that the 10 year rebuilding timeline given in Amendment 6 needs to be maintained and additionally, a re-build plan should be re discussed and developed for Amendment 7.

-The Biological Reference points needs remain unchanged and this issue needs to be removed from Amendment 7. With the striped bass management board failing to maintain a healthy striped bass stock, lowering the goalpost is not a realistic option.

-Remove the issue of Regional Management from Amendment 7 due to the current stock of striped bass and the fact that science is not available to inform stock-specific or regional management.

-Commercial Allocation is significantly outdated and needs to be updated to reflect the characteristics of today's commercial striped bass fishery.

These fish are more important in our waters than not. This decline puts these fish in serious trouble.

Thanks for your time, and trust you will take these comments into consideration for Amendment 7.

Joe Gagliardo
jgagliardo.jr@gmail.com

Comments

From: Konrad Neptun <kpneptun@gmail.com>
Sent: Friday, April 09, 2021 12:26 PM
To: Comments
Subject: [External] Striped Bass PID

Hello Emilie - I hope this message finds you well.

I wanted to quickly take the time to submit a public comment regarding the striped bass fishery. I thank you for taking the time to read my input and have used the PID on your website as a reference.

Overall, keep it sustainable. The population is struggling at its current levels and I would like to see healthier fishery going forward. I have had the pleasure to fish for bass in the NJ oceans / bay as well as the Chesapeake and proud myself as a pure catch and release angler. These two regions represent a very important breeding and summering grounds for the stripers and I have seen everything from large fish kills in the summer months to below / over slot harvesting.

All I ask is that we do NOT overthink this. Simply put, protect them now so we can always enjoy them. Sure there is the charter industry or the small commercial harvest and yes, it is no secret that not all recreational anglers act within the bounds of the rules, so by taking a simple "protect now" stance this will cover all of the categories with no wiggle room or interpretation necessary.

The circle hook fiasco was a great start, albeit the roll out was a bit bumpy. Using the data, here is my support:

- with 100% of females reaching maturity by age 9, protect the breeding group from spawn to maturity for that entire period
- protect the regions that they spawn (the Maryland DNR has done a good job implementing "no go zones" in the Susquehanna flats, creeks, and tributaries that feed into the bay.
- change the narrative - make it cool to C&R, say big fish don't taste good, and make it not about filling a meat cooler

I could go on and on about this but the bottom line is that they need protection. I am a relatively young angler and hearing stories about what was done in the past when my grandfather was fishing the same waters varies greatly from what I have experienced. This shouldn't be about jobs or tax income or political support - this should be about keeping generations fishing, cherishing moments with friends / family alike while on the water, and ensuring that we protect something that quite frankly keeps us in check from all the other craziness the world dishes out.

I appreciate your time and would welcome the opportunity to elaborate on any additional points.

Respectfully,
Konrad

Comments

From: John Weinbuch <jdweinbuch@gmail.com>
Sent: Friday, April 09, 2021 12:06 PM
To: Comments
Subject: [External] Moratorium

Hello,

Growing up, I recall my father and grandfather telling me about the sheer number of fish being caught on Long Island. Blackfish, weakfish, bluefish, flounder, and of course striped bass — by the buckets load.

We all know of the decline of these species. I refuse to tell my future children about what the striped bass population “used to be.”

Striped bass must be catch and release only, in the years to come. Do your part. Protect the species.

Thank you

Comments

From: Matthew Baden <mdbaden@smcm.edu>
Sent: Friday, April 09, 2021 12:05 PM
To: Comments
Subject: [External] Striper regs

Good Morning,

I'm reaching out today to provide my comments and insight on Amendment 7 for Striped Bass Management. I'm 32 years old and I've lived and fished on Maryland's Chesapeake Bay my whole life. I've seen what a great fishery this was in the early 2000s, and now see the lack of numbers and range of sizes the bay and coastal stocks currently have. Overall, I'd like to see measures implemented to increase abundance in numbers of fish across their range of age and size class. I have a 1 year old daughter and I want her to be able to experience the great fishing I did over a decade ago. I'm fearful they won't see the Striped Bass population return to post moratorium levels unless immediate conservation minded action is taken.

Some bullet points regarding Amendment 7 I want to weigh in on:

- Please **Keep 1995** as the Biological Reference Point. Please remove it from further consideration in Amendment 7 and future amendments.
- Maryland should implement measures with the same slot limit that the Northern States used in 2020. There is no need to catch and keep these large fish that sustain the species.
- I believe the four management triggers related to spawning stock biomass and mortality are appropriate which were included in Amendment 6. Please revisit Trigger 5 which may not be an appropriate indicator of recruitment failure.
- We need to have a stock rebuilding target and schedule included and accomplished by 2030. The clock is ticking to impose measures now and please have the rebuilding plan included in Amendment 7.
- Remove regional management from consideration. The spawning biomass is a migratory population and the science is not available to be able to regionally manage the population at this time. Please include recommendations for more regional science and research in the rebuilding plan.
- Conservation Equivalency should only be considered in times when Striped Bass populations are not overfished. As a MD resident since Striped Bass are being overfished I do not want Conservation Equivalency used in our State. If CE is considered States need to be **Held Accountable** for failing to meet their CE objectives.
- Recreational Accountability is complex and spans more than just fishing for Striped Bass. This is a much larger endeavor and please remove this issue from Amendment 7 except as it pertains to CE above.
- Commercial Allocation is out of date as its landing period for allocation dates back approx. 50 years. I'm asking the Striped Bass Board and the Technical Committee to update commercial allocations that better reflect today's Striped Bass fishery.

Thank you for your hard work and please do what’s best for the fish!!

Matt Baden
240-997-2414
Sent from my iPhone

Comments

From: Bob Graham <wanaquebob@gmail.com>
Sent: Friday, April 09, 2021 11:57 AM
To: Comments
Subject: [External] Striped Bass PID

Thank you for the opportunity to provide comments. I will attempt to keep them succinct and clear. Please let me know if you have questions.

Issue 1 - Fishery Goal and Objective: All good; however, I have strong reservations about adopting a long-term management regime that minimizes the need for annual changes or modifications to management measures. I believe ASMFC should be a responsive body based on the best scientific information available. The rates of environmental, and possibly Striped Bass population, fluctuations are increasing, and I do not wish to see states that are reluctant to make changes to their management schemes, **when needed,** use such a clause in the Interstate Fisheries Management Plan to delay implementing measures to achieve the overall goal, as stated.

Issue 2 - Biological reference points: I am a believer in the precautionary principle, and experience has shown it is often very difficult to rebuild stocks once overfished for a prolonged period. The PID indicates the stock models have improved over time, and the 2018 stock assessment indicates overfishing has been consistently occurring. As stated on page 7, "the current reference points may be unattainable given current objectives for fishery performance.". I do not believe this is justification for changing the BRPs, which were meant to reflect a healthy population. I would much rather see the specific, state by state, fishery management objectives reexamined. I know this is not a fun exercise, but strongly support the current BRPs: the 1995 estimate of female spawning stock biomass, and 25% buffer. I will also say that I would not oppose the buffer being revisited after several years, depending on the response of the fish to management practices.

Issues 3 & 4 - Management triggers and stock rebuilding: I have concerns over allowing a Juvenile Abundance Index to fall to the period of record 25% quartile for three years. I would like to see the Board review the potential causes of recruitment failure should it occur over two consecutive years. I believe this is consistent with a dedicated stock rebuilding effort.

Issue 5 - Regional Management: Separate management programs for the Chesapeake Bay and the ocean region make sense to me, based on the differing fishery and environmental conditions. With regards to allocation of F, I would support the recommendations of the Striped Bass Technical Committee.

Issue 6 - Conservation Equivalency: I do believe the states should have some leeway in determining their management strategies for the reasons stated (i.e., differing availability, size structure, etc.). However, there does need to be assurance that CE measures are effective. Having the Board provide a definition for "equivalency" with clear data/analytical requirements makes sense. It seems given the complications associated with CE, such as limited state resources to obtain robust data sets and therefore make a good case their management measures are effective, ASMFC would do well to gather recognized experts to examine the feasibility of CE being a feasible means to help achieve the goals of the FMP.

Issue 7 - Recreational release mortality - Given the high rates of recreational release mortality it is definitely very important to implement an angler education program to help bring down that level of mortality. Too many anglers believe a fish that swims away after being landed is fine. Unfortunately, I have strong doubts angler education alone would be extensive or effective enough. I have fished the Chesapeake Bay and its tidal rivers

for over 20 years, and believe the following restrictions intended to reduce recreational fishing mortality should be considered by the Board:

- Requiring bait fishermen to use offset circle hooks during the Striped Bass harvest seasons. The reduction in fish mortality achieved with circle hooks over J hooks has been well documented.
- Banning the use of treble hooks during Striped Bass harvest seasons, at least during the initial years of implementing the revised FMP. Unhooking fish, especially those netted, that have treble hooks takes much longer than it does with a single-hooked fish. Also, many experienced anglers have noted there is little if any loss in hooking efficiency with single hooks, and single hooks designed to replace treble hooks are commonly available now.
- Trolling is a time-honored method in the waters I fish, and I wish I could provide a practical recommendation for limiting trolling speed. I see so many small Striped Bass being dragged through the water at 5+ knots, and as a fisheries biologist know that this is doing damage. However, outside of a ban on trolling I understand this would be very difficult to enforce.
- In my home state, Virginia, one may still purchase a license for "recreational" gill netting. In the spring in particular, I have been in areas where these were so numerous I could not easily navigate the waters. Banning recreational gill netting should be considered.

Issue 8 - Recreational Accountability: The Board should indeed consider implementing annual recreational harvest limits **provided** it is reasonable to expect MRIP can obtain the data needed to effectively implement a RHL. Overage, underage and stock status must be addressed to provide a level of compliance and certainty for the states.

Issue 9: Coastal Commercial Quota Allocation: I would prefer to see commercial allocation addressed separately so as not to derail the efforts and good that can be achieved through the current action.

Issue 10: Other Issues: The interactions between the health of the Striped Bass population and its prey resources cannot be ignored!d I also stand by the call for more resources to be devoted to law enforcement. I recognize the importance of addressing climate change and habitat degradation, but believe these should be addressed in other venues.

With respect,
Bob Graham

Comments

From: Steven Bassey <stevenbassey@aol.com>
Sent: Friday, April 09, 2021 11:58 AM
To: Comments
Cc: 2021striperPID@gmail.com; Stripercomments@gmail.com
Subject: [External] Striped Bass PiD

Hello,

I am writing to you to express my concerns regarding the striped bass fishery and the mismanagement that has been taking place for years.

Firstly, **we should not be lowering biological reference points by any means**. This is Ludacris, why would we be lowering SSB thresholds, because the suggestion that the value in 1995 was incorrect? This will be detrimental to the stock, instead why are we not aiming for abundance of the stock and allowing the striped bass SPACE TO GROW. We have seen it before, the striped bass is resilient, when given space to regroup. It is possible to regain our stocks of striped bass back to what we once had. I feel it should be EXTREMELY IMPORTANT to focus on angler education. I cannot express how many times I walk the beach in the morning and watch anglers mishandle a bass and say to myself "Another one gone". PUT PROGRAMS IN PLACE FOR EDUCATION...give the anglers good resources and teach them that if we keep heading down this road their grandkids will not have the same joy of catching our beloved striped bass. Sure, it is easy to say, "well what about the loss of money? What about the commercial guys?" Well...what about them? What do we do when 10 years from now there are not striped bass to catch? Do we apologize to them and say "we tried our best" or do we **DO THE RIGHT THING** and end this problem **NOW?** Look at the pictures from the party boats, it is happening right in front of our eyes, the fish are smaller, and harder to find. Is this really the future we want?

Quite frankly, I am disgusted by the state of our fishery. The fish need a break, 5 years of no harvest could have astronomical improvements on the stock. While I hardly believe this will happen, it is a glimmer of hope to protect our future. At the very least, aggressive actions need to be taken to protect the fish we do have. **WE ALL WANT THE SAME THING. WE ALL WANT THE WELL BEING OF THE STRIPED BASS.** At least the fisherman does...I regret to say I do not feel the management of the fishery does. Money should not define the well-being of our fish...

DO THE RIGHT THING. ON BEHALF OF EVERY AVID STRIPED BASS FISHERMAN, PLEASE ACT NOT.

-Steve Bassey

Comments

From: Kyle Dancause <kyledancause@gmail.com>
Sent: Friday, April 09, 2021 11:53 AM
To: Comments
Cc: stripercomments@gmail.com; Stephen Train; Sen. Dave Miramant; Patrick Keliher; Megan Ware; Rep. JAY MCCREIGHT
Subject: [External] Rebuild the Striper Stock!

Dear ASMFC,

I am a recreational kayak fly fisherman living in southern Maine. I have fished for stripers my whole life. It is no secret that Stripers are in trouble and need our help. We must take action to rebuild the stock.

I am writing to you with the utmost urgency and concern regarding the Amendment 7 PID. The Striped Bass stock is at a 27 year low and was declared overfished 2 years ago.

Stripers are in dire need of a comprehensive rebuilding plan now. The 10 year plan outlined in Amendment 6 must be maintained, but new language and firm objectives must be added to amendment 7 to put the stock on a path to recovery.

Further, the biological reference points (objective 2) must be removed from the amendment. The 1995 reference point is an appropriate reference year and should not change. Do not lower the standard just because the Striped Bass Management Board has done a poor job managing the stock. We know that with proper management, this goal can be achieved and the stock can be rebuilt. We did it 30+ years ago and can do it again.

Perhaps the most egregious and infuriating objectives in amendment 7 are objectives 5 and 6. Regional Management and Conservation Equivalency MUST BE REMOVED from the amendment. I can not fathom why these issues are even being considered when the stock is at a 27 year low? That does not make any sense. Stripers are a coast wide fish that are in trouble and must be managed coast wide with a comprehensive conservation and rebuilding plan. Please, remove part 5 and 6 of the amendment.

Stripers need our help and they need it now. The only priority should be rebuilding the stock to healthy levels like we saw in the mid 90's and early 2000's. I fear that by the time my 1 year old daughter is old enough to cast a fly rod, there won't be stripers around for her to experience.

Please, from the bottom of my heart, rebuild the striper stock. Take action, however drastic is necessary, to help rapidly protect spawning females and save these fish.

Take care,

Kyle Dancause
South Portland, ME

Comments

From: louis catucci <catucci.louis@gmail.com>
Sent: Friday, April 09, 2021 11:50 AM
To: Comments
Subject: [External] Striped bass pid

Concerned Mainer ,
I believe we need to take every step to conserve this fishery first an foremost ! No more extension of days for an overfished resource if you can't make your quota it's because there ain't enough fish to catch not because you need more time ! There not there an we need to protect what's left !!
Please do the right thing

Sent from my iPhone

Comments

From: Dave Peros <capt.daveperos@comcast.net>
Sent: Friday, April 09, 2021 11:47 AM
To: Comments
Subject: [External] Striped Bass PID

April 9, 2021

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street Suite 200 A-N

Arlington, VA 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for this opportunity to comment on the Amendment 7 Public Information Document concerning striped bass.

In my opinion the attempts by the ASMFC Atlantic Striped Bass Management Board to introduce a new management plan, in this case Amendment 7, is a flawed and irresponsible practice on the part of the board.

If the board doesn't have any reliable data concerning their most recent major management shift, now is not the time to introduce a new plan at this critical moment.

In the past the Board has seen the need to protect a critical year class, such as in 1985 when size and bag limits were set to protect the 1982-year class, with the goal of allowing 95% of the females in that class to spawn at least once.

But for some reason, the Board elected in 2019 to go with a slot limit that will target the 2015-year class, the most recent significant spawning success, as opposed

to protecting and allowing it to contribute to restoring the current depressed Spawning Stock Biomass.

Given the lack of information regarding the success or failure of changes made in 2019 under Addendum 6 and the current state of the SSB, as well as continued overfishing, now is not the time for a new overall management plan.

That said, I realize it is unlikely the Board will reconsider and suspend the Amendment 7 process. Therefore the responsible action on my part is to comment on the Public Information Document in hand.

In that vein:

1. Goals and Objectives – The lack of anything even suggesting "accountability" is the primary reason for eliminating this section as written. The Board doesn't need more "flexibility" since it has shown by its past actions that it has no problem straying from its responsibilities, even when they are clearly outlined. "Consistency" means the Board can avoid taking corrective action even when it is clearly needed. In addition, one of the goals of the Board should be to listen to the management suggestions and data from the Technical Committee.
2. Biological Reference Points – There is no reason to change from 1995 as an appropriate reference point other than the failure of the Board to maintain a healthy stock. No scientific data has been presented to support this change; instead, being able to kill more fish even when there aren't enough in the water to sustain and build what we have is the motivation here.
3. Management Triggers – Generally speaking, the current management triggers are sufficient and no scientific data has been presented to change them. The real issue is the Board's failure to take the appropriate action when a management trigger indicates this is necessary.
4. Stock Rebuilding Target and Schedule – The 10-year rebuilding target and schedule in Amendment 6 needs no changes. What needs changing is how the Board can be held accountable for its failure to follow these guidelines, as they are doing at the current time.
5. Regional Management – While regional management is certainly worth considering in the future, at the present there is insufficient science regarding specific stock and regional management to include this in the Amendment.
6. Conservation Equivalency – This concept needs to be dropped because it is not a sound management practice. Even more importantly, if it does remain part of the

Amendment, accountability and appropriate punitive action must be clearly outlined when a state's CE proposal doesn't live up to its promises. CE needs to go.

7. Recreational Release Mortality – As a fly fishing and light tackle guide for the past 20+ years, this issue is at the top of my list since far too many people who tout catch-and-release as a superior form of fishing refuse to acknowledge that they kill fish even if they seemingly swim away unharmed upon release. That said relying on, primarily, an outdated study as the basis for the current 9% recreational release mortality falls short of good science. There are currently studies being undertaken, one in particular by the Massachusetts Department of Marine Fisheries, that should provide more accurate data and advance "the best available science" needed to guide management decisions.
8. Recreational Accountability – It is ironic that the Board elected to include this term in their PID for Amendment 7 when they have, in fact, fallen far short of being accountable for their failures in managing striped bass. Including this concept in a document regarding a single species is putting the cart before the horse since recreational accountability is a subject that must be applied to all recreational fisheries, especially with the recent acceptance of ecosystem management as a more advanced and complete concept as opposed to single species management. It should be removed from Amendment 7.
9. Commercial Allocation – Unlike many folks in the recreational sector who still place a large portion of the blame for the issues with the SSB on the commercial community, I recognize this to be a flawed, self-centered way of thinking that fails to acknowledge the reality of what is happening on the water. I have a deep, abiding respect for people who have committed to making a living on the water; on the other hand, I don't believe such a valuable species such as the striped bass should be caught and sold by individuals whom I like to call "recremercials," or recreational anglers masquerading as legitimate commercial fishermen. I realize that the Board might be limited in its powers regarding how an individual state allocates its quota. I believe that anyone who sells bass should be required to prove, perhaps through tax returns, that their income is derived from commercial fishing.

   In addition, charter or guiding operations should not be allowed to sell bass from a trip with paying customers aboard.

   Finally, given that current commercial allocations are determined from data that is almost 50 years old, this information needs to be upgraded in view of current stock assessments.

Since the premise of responsible fisheries' management is based on "the best available science," I would encourage the Board to make funding any research that would provide more data to aid in making informed management decisions a major priority.

Just as importantly, the Board should follow the management guidelines and proposals that this research supports, no matter where it may lead, as opposed to allowing political considerations to interfere with responsible management decisions.

Thank you for your time and consideration.

Sincerely,

Capt. Dave Peros

Capt. Dave Peros Guide Services LLC

capt.daveperos@comcast.net

508-274-9619

Comments

From: Danny Bauer <fdbauer88@gmail.com>
Sent: Friday, April 09, 2021 11:45 AM
To: Comments
Subject: [External] Striped Bass Amendment 7 Comments

Good Morning,

I'm reaching out today to provide my comments and insight on Amendment 7 for Striped Bass Management. I'm 32 years old and I've lived and fished on Maryland's Chesapeake Bay my whole life. I've seen what a great fishery this was in the early 2000s, and now see the lack of numbers and range of sizes the bay and coastal stocks currently have. Overall, I'd like to see measures implemented to increase abundance in numbers of fish across their range of age and size class. I have 2 young sons and I want them to be able to experience the great fishing I did over a decade ago. I'm fearful they won't see the Striped Bass population return to post moratorium levels unless immediate conservation minded action is taken.

Some bullet points regarding Amendment 7 I want to weigh in on:

- Please **Keep 1995** as the Biological Reference Point. Please remove it from further consideration in Amendment 7 and future amendments.
- Maryland should implement measures with the same slot limit that the Northern States used in 2020. There is no need to catch and keep these large fish that sustain the species.
- I believe the four management triggers related to spawning stock biomass and mortality are appropriate which were included in Amendment 6. Please revisit Trigger 5 which may not be an appropriate indicator of recruitment failure.
- We need to have a stock rebuilding target and schedule included and accomplished by 2030. The clock is ticking to impose measures now and please have the rebuilding plan included in Amendment 7.
- Remove regional management from consideration. The spawning biomass is a migratory population and the science is not available to be able to regionally manage the population at this time. Please include recommendations for more regional science and research in the rebuilding plan.
- Conservation Equivalency should only be considered in times when Striped Bass populations are not overfished. As a MD resident since Striped Bass are being overfished I do not want Conservation Equivalency used in our State. If CE is considered States need to be **Held Accountable** for failing to meet their CE objectives.
- Recreational Accountability is complex and spans more than just fishing for Striped Bass. This is a much larger endeavor and please remove this issue from Amendment 7 except as it pertains to CE above.
- Commercial Allocation is out of date as its landing period for allocation dates back approx. 50 years. I'm asking the Striped Bass Board and the Technical Committee to update commercial allocations that better reflect today's Striped Bass fishery.

Thank you for your hard work and please do what’s best for the fish!!

Danny Bauer

Huntingtown, MD

Comments

From: Carly Audet <carlymyers802@gmail.com>
Sent: Friday, April 09, 2021 11:48 AM
To: Comments
Subject: [External] Striped Bass PID

Commissioners,

I am writing to you with my comments on the striped bass Public Information Document (PID).

I find myself very frustrated with the state of the striped bass population as it stands today.

I urge the ASMFC commissioners to take actions, through these measures:

1) We should not be managing for harvest, we should be managing for abundance. We should be managing the fish, for the fish's sake. If we do so, the rest all takes care of itself. More fish in the ocean, is more fish to catch.

2) We cannot lower biological reference points. The size of the fishery should not be shrunk. We should NOT be lowering the SSB thresholds, or suggesting that the 1995 value was incorrect in assessing the size of the fishery. We have been at or above this number in the past. The only thing stopping us now is the will of the board to listen to the anglers and to science.

3) We should be more aggressive with rebuilding. The slot limit, and the statistics/models used to defend it, are on such a slow timeline, 10+ years, that they already break the mandate set by amendment 6. Beyond that, we are walking the razor's edge between rebuilding, and collapse. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness or unforeseen weather event, and the fishery collapses.

4) Management measures should be built and maintained for consistency and longevity, and based on robust scientific data.

4) We need to abolish conservational equivalency (CE). In technicality CE can work, but in practicality, it does not. It allows states to escape regulation, and has done nothing but result in overfishing.

6) Aggressive angler education should be conducted to decrease release mortality. We can do more to attenuate release mortality.

7) Whether through a striper stamp or other means, funds should be raised to support enforcement of rules and regulations. Poaching is rampant; both scientific and anecdotal evidence is clear on this. Back door, illegal selling of fish is also a problem (from both recreational and corrupt commercial anglers). These must be curbed, at a minimum, with the goal of being stopped completely.

8) Finally, in a perfect world, we would give the fish a break for 5 or more years, with no harvest at all. If we are not going to eliminate harvest, we must take aggressive actions to protect what fish we have left. While I am for allowing occasional harvest, allowing anglers to keep fish every single day, for a huge portion of the season, is clearly not going to work anymore.

I will reiterate my main point: everyone wants the same thing, and that is more fish in the ocean. Please do whatever it takes to make this happen.

With great concern,

Carly Audet

Comments

From: Blane Chocklett <bchocklett@comcast.net>
Sent: Friday, April 09, 2021 11:40 AM
To: Comments
Subject: [External] Save the Striper

I ask you to please protect our Striper's, they need our protection. They are more important alive and flourishing in our oceans then dead or extinct. Please do what is right and protect them now before it is to late.
Blane Chocklett

Sent from my iPhone

Comments

From: Mike Pavlov <mikepavlov2@gmail.com>
Sent: Friday, April 09, 2021 11:41 AM
To: Comments
Subject: [External] Striped Bass PID

My name is Mike Pavlov. I live in Brewster, Massachusetts. I am a recreational fisherman.

1. Fishery Goals and Objectives

I don't have anything to add but I would like to comment on some of the stated objectives.

I don't think States should be given any flexibility to implement alternative strategies. A migratory fish should warrant complete coastal management. The system isn't fair for a State like Maine that doesn't allow commercial harvest while a State like Massachusetts wants to extend it's commercial season to begin earlier so that it can intercept and harvest the Spring migration to Maine, to be able fill its' quota. There isn't any motivation for any given state to enact stronger conservation measures with States competing for the same resource.

As far as adopting a long term management regime, unfortunately, I don't think that will be possible. Climate change as it accelerates will make it increasingly difficult to predict changes in the availability of food sources, changes in water temperature, and all the other consequences of therein. if anything, shorter term ongoing management will probably be required.

2. Biological Reference Points & 3. Management Triggers

I don't think a female SSB benchmark should be the only action point. I believe looking at 3-4 year trends needs to be included and treated equally. I understand YOY classes can vary significantly from year to year based on a number of factors. But it's throwing the dice if trends are ignored as they were after 2010. I would say even if we are still within or above some percentage of the female SSB, stricter measures should be taken if there is a multi-year downward trend.

Given the SSB, I don't have enough knowledge to know where a reasonable SSB should be to promote a healthy fishery. If I were to look back historically, and if there's a way of making a determination, I would estimate a value based on the last time stripers could be caught anywhere along the coast. Right now we hear of entire coastal regions void of Bass while in other regions fishermen are still catching good numbers. I'm fortunate to live on Cape Cod to still see a decent run of fish. But it's not fair to other coastal communities void of the fishery right now. Everyone should have the same opportunities.

4. Stock Rebuilding Targets and Schedule

I am in favor of rebuilding the stock as quickly as possible regardless of the sacrifice. The fishery has been in a long drastic decline. We need drastic measures to stop the decline and reverse the trend as over time it will take more time if we don't.

5. Regional Management

I think the board should apply appropriate conservation measures to each region based on the direction of that region's biomass. I trust the board more than I trust the States to enact the necessary measures.

6. Management Program Equivalency (Conservation Equivalency)

I think there is enough historical precedence for the board to understand the circumstances of each region. I understand Chesapeake bay is not the Hudson river and is not Cape Cod. The board should apply conservation measures accordingly.

7. Recreational Release Mortality & 8. Recreational Accountability

It's disheartening to hear Recreational fishermen constantly blame commercial entities on the striped bass decline. We are all part of the issue. I think it would be advisable to limit Recreational fishermen to single hooks for lures, and circle hooks for bait. When the biomass has reached its early 2000's numbers, previous hook configurations can be reinstated. It will draw a lot of complaints but it's less of a hardship to limit fishing methods now than more drastic measures later.

9. Coastal Commercial Allocation

My only comment about this is I have no issue with a commercial harvest but I wish there was some way to limit it to true commercial fishermen. It drives me crazy to see guys in boats in the 200K-300K+ fishing for Stripers commercially. I can tell because on commercial days I see the added influx of boats launching at the ramp and what kind of boats they are. I know there is no way of regulating this but a commercial license can hereby acknowledge with signature the purchaser relies on a certain percentage (80-90?) of their income to commercial fishing. There's nothing we can do if someone would not be honest in purchasing that kind of commercial license with that requirement, but at least if they are caught overharvesting, they can be dealt with accordingly and an example could be made. And so it would become a federal tag as it is for Bluefin.

10. Any other issues concerning the management of Atlantic striped bass

As I mentioned in my comments for #1, I believe climate change will make the challenges of Striped bass management that much greater. We don't know what we don't know as to what may happen in the next 10-20 years regarding the Striper biomass as it just relates and reacts to effects of water temperatures and added scales of storms. Therefore, the greater the conservation measures that can be taken now the better. Let's try to establish a buffer for the future of even greater uncertainty.

Thank you for letting me voice my opinions.
Take care,
Mike

Comments

From: Shane Clift <shaneclift10@gmail.com>
Sent: Friday, April 09, 2021 11:29 AM
To: Comments
Cc: Shane Clift
Subject: [External] Striped Bass Amendment 7 Comments

Good Morning,

I'm reaching out today to provide my comments and insight on Amendment 7 for Striped Bass Management. I'm 33 years old and I've lived and fished on Maryland's Chesapeake Bay my whole life. I've seen what a great fishery this was in the early 2000s, and now see the lack of numbers and range of sizes the bay and coastal stocks currently have. Overall, I'd like to see measures implemented to increase abundance in numbers of fish across their range of age and size class. I have a 2 year old daughter and another one on the way and I want them to be able to experience the great fishing I did over a decade ago. I'm fearful they won't see the Striped Bass population return to post moratorium levels unless immediate conservation minded action is taken.

Some bullet points regarding Amendment 7 I want to weigh in on:

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- Recreational Accountability is complex and spans more than just fishing for Striped Bass. This is a much larger endeavor and please remove this issue from Amendment 7 except as it pertains to CE above.

- Commercial Allocation is out of date as its landing period for allocation dates back approx. 50 years. I'm asking the Striped Bass Board and the Technical Committee to update commercial allocations that better reflect today's Striped Bass fishery.

Thank you for your hard work and please do what's best for the fish!!

Shane Clift

Annapolis, MD

--
Shane Clift
shaneclift10@gmail.com

Comments

From: scottt40 <scottt40@comcast.net>
Sent: Friday, April 09, 2021 11:16 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Stripers

Firmly believe that the food source is being decimated by the Omega boats in the lower bay, not to mention the bycatch. Also believe commercial fishing is harming the population, not allowing those 18" fish to get to large spawning size.

Scott Taylor

Sent from my Verizon, Samsung Galaxy smartphone

Comments

From: Joseph Maisonave <maisonavej@gmail.com>
Sent: Friday, April 09, 2021 11:17 AM
To: Comments
Subject: [External] Striped Bass PID

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Good morning Emily,

As a resident of Portland, Maine and a local striped bass angler, I support the 10 year moratorium on harvesting stripers. I have never harvested a single fish in the 10 years I have fished Maine waters. In all my successes, I also never seem to match the stories from some of my fellow anglers in past years. The stories of large bass roaming Casco Bay and the rocky coast all summer are almost folklore at this point. In more recent years, I have witnessed huge schools of menhaden and only seals around throughout the summer months. The striper season seems to have been reduced to a mediocre spring season and the fall run is nearly non-existent in Maine.

I have also witnessed first hand the abuse of commercial charter boats in states like NY and the number of fish harvested each tour. For a 50 person charter boat that is able to do 3 or 4 tours a day, the amount of fish harvested is staggering. Multiply that by the hundreds of boats trolling the waters daily during the fall run, and the number of fish removed starts to become unconscionable.

As I have found a new love of fishing through fly casting, I firmly believe the sport needs a thriving fishery like striped bass. The social and economic benefits through recreational fishing is important and far outweighs the commercial hauls of fish to sell at market. Besides that, I firmly believe that a thriving population of a migratory fish species like striped bass should be the center focus and end goal of all conversations. If it required a moratorium on targeting striped bass all together for a number of years to improve the population then so be it.

I firmly support this moratorium for the sake of improving the striped bass fish population. Thank you for your efforts.

SIncerely.

Comments

From: Bob Lewis <bonds7@comcast.net>
Sent: Friday, April 09, 2021 11:10 AM
To: Comments
Subject: [External] Amendment 7

During the past few weeks I have been reading articles and listening to various Zoom meetings, Podcasts and other sources of detailed info regarding the proposed amendment 7. The main question is why now? There seems to be clear evidence that the current striper stock is in trouble. In order to gain any confidence from the public why don't you at least follow amendment 6 first. There should be a priority to start the mandated 10 year rebuilding plan of the stock. I do not believe there should be any progress on amendment 7 until there is a re-building plan in place.

I am currently a member of 4 fishing clubs in the south shore and Cape Cod area. I have served as President for two of them and therefore I get lots of feedback from members, guides, charter captains, commercial fishermen and of course recreational fishermen. Based on past peaks and troughs of the striper stock, all focus should be on preserving the 2015 class so that they can breed multiple times. Please pay attention to history on this topic. We know what works and what does not.

I am VERY wary of conservation equivalency. Has there been any follow up to actual numbers from the states that have chosen this? What are the consequences if the numbers do not actually prove equivalent?

In summary, I believe the focus should be on creating a detailed re-building plan first. In the meantime, there are new studies happening regarding release mortality, which should be considered for future policy. Focus on preserving the 2015 striper class ASAP and postpone amendment 7 to a future date.

Bob Lewis
Osterville Anglers Club, Cape Cod TU, South Shore Fly Caster and Cape Cod Flyrodders

Sent from Mail for Windows 10

Comments

From: andrew dzenis <adzenis13@gmail.com>
Sent: Friday, April 09, 2021 10:59 AM
To: Comments
Subject: [External] Striped Bass

Hi,

I have been a mate on party and charter boats my entire life.

Though painful, I feel there should be a two year moratorium on commercial and recreational harvest of striped bass. Until that is done, this species will not have a proper chance to rebound.

The slot limit is a good start, but charter and recreational anglers lack the tools and training to properly revive 35+ inch fish. If the slot is kept, all charter boats should be required to have proper lip grippers to swim and revive these big fish. The vast majority throw the fish back in the water. Once water temps warm, the chance of the big bass making it are slim to none.

Also, the fact that the NJ top of the slot is 38 inches, and not 35 inches like New York, and that the commercial harvest minimum size is 38 inches in Massachusetts is an absolute joke. I fish in all three states, and there needs to be a consistent regulation from North Carolina to Nova Scotia.

In an ideal world, a moratorium would rebound the stock. At this time, I think there should be a minimum size of 32 inches, no slot and 1 fish per man. Charters end up killing more bass as they have to catch more to fill a limit, and almost all those big fish are dying when thrown back in the water. It is a tragic waste.

Additionally, there should be ZERO commercial menhaden harvest.

Thank you.

Comments

From: Gerald Aloi <aloij23@gmail.com>
Sent: Friday, April 09, 2021 10:54 AM
To: Comments
Subject: [External] Striped Bass PID

Dear ASMFC,

I am a recreational Striped Bass fisherman that has enjoyed this fishery for decades and have spent many thousands of dollars in pursuit of this sport fish. Every year I fish the waters around Cape Cod and have recently purchased a home there in Barnstable County.

Since the mid 1970's, when I started fishing Cape stripers, the fishery has undergone several cycles, but there is no doubt in my experiences that the both quantity and quality of fish have trended downward over time.

With grandchildren of my own now, I am discouraged with the never ending harvesting/regulations debate between commercial and recreational and policy folks.... and worry that they will be the ultimate losers of this debate. The politics around this are regrettable. ***Short-term financial gains should not trump the long-term health of the fishery.*** The juxtaposition of this sentiment would be: short-term pain will lead to long-term gains.

On behalf of the fishery and fishermen that share my values on the subject, I advocate the following:

- Let the fish spawn without being harassed - ***severely limit access to spawning areas***
- ***I support a Striped Bass stamp program*** much like I support the federal duck stamp program that has been in-place for over 50 years. Money should be funneled back into the fishery.
- ***BAN gillnetting Striped Bass*** - it is indiscriminate and financially benefits a few to the detriment of all others
- ***Heavily fine poachers*** and violators of Striped Bass (and all other species) - make an example out of the violators including boat confiscation, exorbitant fines, and loss of fishing rights. ***Re-invigorate the "Turn-in-a Poacher" program.***
- ***Fishing equipment modifications that do less harm to fish*** that are released just makes sense!
- ***Severely limit the number of commercial licenses awarded***. "Non-Commercial" fishermen can easily buy a Commercial license that allows them harvesting privileges above that of recreational fishermen. Commercial licenses should require an extensive application process and be awarded only after a multi-member non-partisan panel in each ASMFC state reviews and approves the application - this would eliminate the cheaters.

Please fight for the greater good versus for the benefit of the few.

Regards,
Gerald Aloi
4314 Barker Hill Rd.
Jamesville, NY 13078

Comments

From: G2W2
Sent: Friday, April 09, 2021 10:57 AM
To: Comments
Subject: FW: [External] Comments on PID 7 after March 25 Webinar

From: T. DEVINE [mailto:tadevine1@verizon.net]
Sent: Thursday, April 8, 2021 9:14 PM
To: G2W2 <G2W2@asmfc.org>
Subject: [External] Comments on PID 7 after March 25 Webinar

I am a member of the Hi-Mar Striper Club from Middletown, NJ. The Hi-Mar Club has already submitted comments and I agree with them. I am offering these additional comments on my behalf only.

1. On page 3 of the PID it refers to managing for “conservation”. I would like this changed to “sustainable fishery”. This is not semantics. Those who propose a moratorium are consistent with conservation in the extreme. Sustainable fishery encompasses conservation and commercial and recreational harvest and is consistent with the Magnuson-Stevens act.

2. I would like the council to calculate and publish the estimated SSB using +/- 5% in mortality. If 9% mortality is used for the current SSB, please publish the estimates for 4% and 14% mortality. This will enable all to see the impact of mortality on SSB, and whether it is even worth arguing about the mortality number.

3. I would like the council to revisit the estimated mortality of recreational striped bass releases. When I read the document that was referenced for the mortality study, and other similar studies, it referred to salinity, temperature, and stress as key variables in mortality. These mortality studies necessarily were conducted in relative shallow water which often have higher temperature and lower/more variable salinity than the ocean. If the council can separate the ocean vs non-ocean catch, I would recommend using a lower mortality for the ocean catch due to more constant and higher salinity and lower temperatures than bays and rivers.

4. I would like the council to begin discussions about restricting catches in selected areas at selected times of the year. Bays and rivers are the spawning areas for stripers. If there is a particular time slice when stripers are concentrated in these areas, limiting fishing both reduces harvesting and increases young of the year, a 2 for 1. (Taking egg-laden fish anytime prior to spawn has an impact, but I stress if there is a time when they are particularly concentrated, that may be when to act.)

I don’t propose this for current regulations. This is forward looking. What would be “closed’ and when. Closures of even one day a week during spawning should have a measurable effect on young of the year. IF cutbacks are needed in the future, I would like consideration given to this approach rather than continuing to reduce slot sizes.

5. I understand that hte SSB encompasses the EEZ andd well as state waters. Does the council have an estimate of the percentages in each. (Obviously, they move back and forth.) Is this being affected by things like sand mining or increases in artificial reefs.

Thank you for presenting the webinar on March 25. It gave me an appreciation of the diversity of opinion that you have to deal with while setting regulations.

Thomas Devine

42 Majestic Ave

Lincroft, NJ 07738

Comments

From: Robert Taylor <nsfcharters@gmail.com>
Sent: Friday, April 09, 2021 10:43 AM
To: Comments
Subject: [External] Amendment 7 issues

Issue 1—Goals and Objectives: We believe that the current goal and objectives for the fishery are sufficient recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2—Biological Reference Points: We continue to believe that 1995 is an appropriate reference year, and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3—Management Triggers: The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. We do believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4—Stock Rebuilding and Target Schedule: We strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5—Regional Management: Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, we recommend removing this issue from further consideration in Amendment 7.

Issue 6 —Conservation Equivalency: We believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7—Recreational Release Mortality: We believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8—Recreational Accountability: The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. We view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, we recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

--
Captain Robert Taylor 9788770997 NSFcharters.com

Comments

From: Carlo Mosca <carlogmosca@gmail.com>
Sent: Friday, April 09, 2021 10:42 AM
To: Comments
Subject: [External] Striped bass regulations

Hi my name is Carlo M and I believe the protection of striped bass is crucial for present and future generations of anglers as well as the species as a whole. Aside from their importance to the ecosystem, striped bass have done an incredible deal on the fishing community. It has brought people together in a way few other fish have. I believe there should be a maintained a slot size as well as limiting the amount of fish that can be taken is crucial to help in the issue of the ever shrinking population. Also more research on the species as a whole is critical to move forward and create better protections for the species.

Thanks, Carlo

Comments

From: Bran Dougherty-Johnson <bran@brandoughertyjohnson.com>
Sent: Friday, April 09, 2021 10:31 AM
To: Comments
Cc: stripercomnents@gmail.com; 2021striperPID@gmail.com
Subject: [External] Striped Bass PID

To the ASMFC
I am a fisherman from Shelter Island, NY and a member of Montauk Surfcasters Association and the North Fork Anglers. I'd like to urge you to do everything you can to rebuild the striped bass stock as quickly and as soon as possible.

My recommendations:
1. Make the striped bass a gamefish only until overfishing is ended. Ban commercial and recreational harvest while rebuilding the stock.

2. Keep 1995 as the Biological Reference Point year.

3. The 4 management triggers are appropriate.

4. The 10-year stock rebuilding timeline is appropriate. We should rebuild the stock as soon as possible!

5. Regional management should include seasonally closing the NY Bight, Raritan Bay and Hudson to fishing while striped bass are spawning. Local areas that are nurseries for the striped bass like the Chesapeake Bay should be managed differently than Montauk, Cape Cod or Maine.

6. Conservation Equivalency rules should be eliminated while the striped bass is considered overfished and overfishing is occurring. I believe we should have consistent catch requirements along the coast. This will eliminate confusion and help protect the fishery.

7. Recreational release mortality - encourage catch and release best practices, the use of single trebles and crushed barbs. Educate anglers on how to revive and release fish effectively.

8. The RHL should be considered, however better data on catch and release mortality as well as more timely and accurate MRIP surveys are necessary before implementing these.

9. Harvesting striped bass commercially currently during a period of overfishing should be suspended.

10. Make the striped bass a game fish. Ban gill net fishing along the coast.

Thank you for your attention to these matters.
Best,
Bran Dougherty-Johnson

Comments

From: Rgedds <rgedds@aol.com>
Sent: Friday, April 09, 2021 10:33 AM
To: Comments
Subject: [External] Striped Bass PID

I support the efforts to to save the striped bass population up to and including making it a no sale fish!
A moratorium on any harvest commercial and recreational until stocks recover.

Sent from the all new AOL app for iOS

Comments

From: MP <mikepanza8@gmail.com>
Sent: Friday, April 09, 2021 10:27 AM
To: Comments
Cc: 2021striperPID@gmail.com; stripercomments@gmail.com
Subject: [External] Striped Bass PID

To Whom it May concern:

My name is Mike Panza, I'm 27 years old and live in Eastern CT along the rhode island border. I am writing to you as an **extremely concerned and disappointed** recreational angler who fishes for striped bass along the CT, RI, and MA coasts from March to December.

The fishery should be managed so that the population increases. Why are we managing to harvest and kill fish? It makes no sense. The slot limit is pointless and will take far too long to show an improvement in the overall numbers of the fish. Why allow the killing of the same size of fish, year after year? So many folks who are educated in the biology of striped bass claim that many, if not all fish that exceed 30" are females who either actively breed or will in the very near future. There are many species that have limits on the number of females that can be harvested. Think about waterfowl, upland birds, etc. Why kill breeders? They are so valuable

When it comes to striped bass, the recreational industry FAR exceeds the commercial industry in terms of revenue. Why are you so set on appeasing the commercial industry? It is pathetic. There should be a moratorium on striped bass so that the population has a chance to GROW. If you want to think about $$, then wouldn't it make sense to at least give the resource a chance to rebound and become abundant again?

People love fishing for striped bass - it gets them out of bed in the morning, and keeps them out late into the night. It's an escape, an outlet, a lifestyle, and a passion for so many. We don't do it to fill our pockets or to put food on the table.

Do the right thing and people will talk about 2021 the way they talk about the incredible comeback the striped bass made not that long ago.

- Mike

Comments

From: Trenten Forbes <trentenforbes01@gmail.com>
Sent: Friday, April 09, 2021 10:08 AM
To: Comments
Subject: [External] Striped bass PID

Although not From the east coast I am a Colorado Resident. I fish for hybrid striped bass here that are sterile and never get a chance to reproduce and we have a high limit on harvest for them so we never see them at their full potential.

As far as Atlantic striped bass go we need to keep something like that from happening. Lowering limits until target stock numbers being met is one of the only ways I see working.
Thank you for your consideration

Sent from my iPhone

Comments

From: mailagent@thesoftedge.com on behalf of John Colucci <mailagent@thesoftedge.com>
Sent: Friday, April 09, 2021 9:51 AM
To: Comments
Subject: [External] Striped Bass PID

Dear Ms.:

I appreciate the opportunity to comment on the future of the Striped Bass stock. As an angler myself I have enjoyed the return of the striped bass, but have noticed a huge decline in recent years. I would like to see the striped bass protected further, specifically protecting spawning females. I understand this is a topic that is multifaceted, with concern to anglers as well as business owners. I think further decimating the population would be negative for all involved. I think further protections such as limiting the harvest of striped bass before May 15th-21st would help. I think these dates would still allow anglers to fish the spawn run, but allow more spawning females to reach their spawning grounds before being harvested. It's what I would consider a compromise. I would also appreciate any other protection for spawning females to help increase the biomass of the stock.

Thank you for taking the time to hear us out.

Sincerely,

John Colucci

Comments

From: Jerry Audet <indeepoutdoorsmedia@gmail.com>
Sent: Friday, April 09, 2021 9:44 AM
To: Comments
Subject: [External] Striped Bass PID comments

Commissioners

It is with grave concern I write to you with my comments on the striped bass Public Information Document (PID).

I am a writer, photographer, and seminar speaker whose life completely revolves around the Striped Bass. I live in Massachusetts, but regularly fish in every state in New England, and used to travel to Long Island regularly when fishing was better. While I have done many things in my life, and pursue many passions, everything changed once I started fishing for stripers in the surf. What these fish mean to me cannot be measured in dollars or cents. Indeed, it is hard to even describe in words; though I try regularly, and relay these feelings and thoughts to tens of thousands of anglers on a monthly basis.

I cannot voice strongly enough my frustration with the state of the striped bass population as it stands today. How did we get here? How could such a conservation success story be so close to demise, yet again? How could the ASMFC fail to take action for so long, and more recently choose to take such weak, gambling measures (with implementation of the slot limit, with a p=0.05 chance of succeeding, over a time span of >10 years)? As a scientist with a doctoral degree, I am routinely appalled at the misuse, misrepresentation, and disregard this body has for fisheries science, what these data are telling us, and how it rejects these data in favor of an insignificant minority of recreational and commercial sectors.

Except for a miniscule minority, we all want the same thing**.** We want more bass in the ocean. I sat in on 9 of the 11 hearings, and the public comment was nearly unanimous. **Angler's comments were pleading, angry, disappointed, and frustrated. We are fed up. We need aggressive, immediate action to turn this fishery around, no matter the cost.** Even if it hurts some of us in the short term, the ASMFC must be bold and sweeping with its next actions. I personally would be saddened by coast-wide seasonal closures, requirements for single inline hooks, or other limiting recreational and/or commercial measures; yet, if that is what it takes to turn this fishery around, then that is what we must do. We must make sacrifices, as clearly what we are doing now isn't working. In the end, if the fishery dies, it won't matter what I want right now, won't matter what any of us wants right now, because the fish will be gone forever. **We must think of the future, and stop living in the knee-jerk world of *right now*.**

I urge the ASMFC commissioners to be bold, through these measures:

1) **If you read nothing else in this letter, please read this: We should not be managing for harvest, we should be managing for abundance.** It is undeniable the commission has made it's number one goal to kill as many fish as possible- not manage the fishery for how many we can ensure are alive and in the ocean. We should be managing the fish, for the fish's sake. If we do so, the rest all takes care of itself. More fish in the ocean, is more fish to catch.

2) **We cannot lower biological reference points.** The size of the fishery should not be shrunk. We should NOT be lowering the SSB thresholds, or suggesting that the 1995 value was incorrect in assessing the size of the fishery. We have been at or above this number in the past. The only thing stopping us now is the will of the board to listen to the anglers. Indeed, if we had limited harvest when the fishery rebounded, not only would we still have incredible abundance, we

likely would have kept growing from the peak we reached in the late 1990's and early 2000's. Lowering the SSB thresholds is one of the worst things we could do for the fishery. To lower SSB thresholds is to succumb to the acute desires of a miniscule minority of anglers, and surrender to illogical incompetency.

2) **The recreational value of this fish cannot be overstated.** I hear little discussion of the jobs and income lost on the recreational side, yet I often hear discussion of the commercial fisherman interests and what losses they may suffer. While I understand something will likely have to be done to subsidize or supplement these commercial fishermen while they learn to leverage other avenues of income, their earnings and impact on the economy are miniscule when compared to the recreational industry. Through my connections with the industry, I know for a fact that a single, small tackle shop in Rhode Island makes 16% of the entire income of the Massachusetts commercial fleet. That is one small shop, in one small state. Now, add up the boat sales, slip rentals, gas for boats and vehicles, kayak sales, hotel rooms, restaurants, coffee shops, national retailers, large and small lure makers, charter captains…the list goes on and on. The number is in the billions, and while poorly studied, it is obvious where the value of these fish lies. Further, if a commercial fishery remains, regulations should be updated from the values used to regulate the number of fish caught and sold. Since it is from the 1970's, how can we assume it is even valid anymore? At minimum, this should be assessed.

3) **We should be more aggressive with rebuilding.** The slot limit, and the statistics/models used to defend it, are on such a slow timeline, 10+ years, that they already break the mandate set by amendment 6. Beyond that, we are walking the razor's edge between rebuilding, and collapse. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness or unforeseen weather event, and the fishery collapses. Why not just rebuild over 3 years, or 5 years, instead of the 10-13+ years it now is suggesting it will take? Why wouldn't the commission move from a $p=0.5$ this will work, to something like $p<0.3$, or the scientific standard of $p<0.05$? Who could argue building the fishery back more quickly is a bad thing?

4) **Management measures should be built and maintained for consistency and longevity, and based on robust scientific data.** Knee-jerk management actions have only hurt the fishery. We need to play the long game, and the short-sightedness of most of the states and the commission has been damning. If the commission had left in place some or most of the more stringent measures of the 1980's and 1990's, certainly we wouldn't be in the free-fall we now find ourselves in. Basing our decisions on data, and not opinions or feelings, is how we should be managing all fisheries. Short term changes are possible, but only while keeping the long-term goals in place.

4) **We need to abolish conservational equivalency (CE).** In technicality CE can work, but in practicality, it does not. It allows states to escape regulation, and has done nothing but result in overfishing (e.g. Maryland overharvesting striped bass by 250% without penalty). Further, there is ZERO accountability when a state misses. Until the commission can come up with ways to pay back the fish taken through the guise of CE, it should be eliminated.

6) **Aggressive angler education should be conducted to decrease release mortality**. While this is the boogey-man used by some groups, it is undoubtedly a huge problem and *has* to be addressed. Yet, if it is such a large problem, why is the commission being so lax on fixing it? We can certainly do far better than just the implementation of circle hook measures. Videos, advertisements, and in-person courses should be funded on proper release techniques, and how to ensure fish survive the process of catch and release. While the circle hook mandate is well intentioned, and I completely support it, there is still a lot more that can be done.

7) **Whether through a striper stamp or other means, funds should be raised to support enforcement of rules and regulations.** Poaching is rampant; both scientific and anecdotal evidence is clear on this. Back door, illegal selling of fish is also a problem (from both recreational and corrupt commercial anglers). These must be curbed, at a minimum, and stopped completely being the goal.

8) **Finally, in a perfect world, we would give the fish a break for 5 or more years, with no harvest at all.** Many anglers- thousands and thousands of them- are calling for a 10-year moratorium. While I support this, it is likely an impossibility given the mixed desires of the public, commercial and charter sectors, and the lack of will of the ASMFC. Therefore, if we are not going to eliminate harvest, we must take aggressive actions to protect what fish we have left. I am firmly in the camp of allowing occasional harvest. However, allowing anglers to keep fish every single day, for a huge proportion of the season, is clearly not going to work anymore.

I will reiterate my main point: **everyone wants the same thing, and that is more fish in the ocean.** The ASMFC has failed in this objective, after one of what is arguably the greatest fisheries comeback of all time. **The commission has failed the stakeholders, and we are fed up.** The public was clear in its comments during all the hearings. I see it on social media, on fishing forums, at my seminars, and amongst my friends. We want more fish and better regulation. Please, before it is too late.

With great concern,

Dr. Gerald Audet, PhD

Douglas, MA

PS There was a time and place, not that long ago, that the idea of cod being unfishable was laughable. A time when winter flounder were so plentiful on the beaches of Long Island, they were nearly impossible *not* to catch. Yet, here we are: both are essentially gone. I pray, every day, that I'm not telling my great grandchildren "I remember when you could catch stripers everywhere!" Do you want this to be your legacy? Or, would you rather be known for taking a stand and doing what is right? **This is on you, commissioners. We have spoken. The future is now in your hands.**

Comments

From: Daniel Lewis <danieltlewis1988@gmail.com>
Sent: Friday, April 09, 2021 9:18 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped bass need to be saved

To whom it may concern:

1) **We cannot lower biological reference points**. The fishery should not be shrunk. We should be NOT be lowering the SSB thresholds, or suggesting that the 1995 value was incorrect in assessing the size of the fishery. In other words, we should not be saying "oh, we'll never get back to that level we had in the early 2000's, so we should just lower the size we manage". This is, by far, the worst thing we could do for the fishery.
2) We should not be managing for yield/harvest, we **should be managing for abundance**. Why the number one goal is how many we can kill- not how many we can ensure are alive- is very frustrating. We should be managing the fish, for the fishes sake!
3) We should be more aggressive with rebuilding. The slot limit, and the statistics/models used to defend it, are on such a slow timeline, 10+ years, that they already break the mandate set by amendment 6. Beyond that, we are walking the razor's edge between rebuilding, and collapse. A couple more bad years of recruitment, an over harvest, perhaps some kind of sickness, and we collapse. Why not just rebuild over 3 years, or 5 years, instead of the 10-13+ years it now is suggesting it will take?
4) Abolish CE. In technicality it can work, but in practicality, it does not. It allows states to escape regulation, and has done nothing but result in more dead fish. There is ZERO, ZIP, NADA accountability when a state misses.
5) Commercial regulations should be updated from the values used in the 1970's- do we know these are valid anymore?
6) Aggressive angler education should be conducted to decrease release mortality. Webinars, social media, pamphlets at tackle, shops anything to help educate anglers will help the fish.
7) Money- whether through a striper stamp or other means- should be put into enforcement of rules and regulations. Poaching is rampant and people are blatant about it comes to poaching. Back door, illegal selling of fish is a problem. These must be curbed, at minimum.

Finally, in a perfect world, we would give the fish a break for 5 or more years, with no harvest at all. Many are calling for a moratorium. While I support this, it is likely an impossibility given the mixed desires of the public, commercial and charter sectors, and the will of the ASMFC. Therefore, if we are not to eliminate harvest, we must take aggressive actions to protect what fish we have. **EVERYONE wants the same thing: more fish in the ocean.** The ASMFC has failed in this objective, after one of what is arguably the greatest fisheries comeback of all time. The public was clear in its comments during all the hearings. I see it on social media, in the forums, amongst my friends. WE WANT MORE FISH AND BETTER REGULATION. PLEASE.

DO THE RIGHT THING. Manage for abundance, and let the fishery grow to the majesty it once was.

Daniel Lewis of Weymouth, Ma

Comments

From: Ian Pause <ianpause@gmail.com>
Sent: Friday, April 09, 2021 9:17 AM
To: Comments
Cc: stripercomments@gmail.com; 2021striperPID@gmail.com
Subject: [External] Striped Bass PID

The striped bass fishery is something unique and needs to be treated as such. As a migratory species that hugs the coastline for it's annual migration, targeting striped bass can be viewed as the proverbial 'fish in a barrel'. Steps need to be taken from an education and regulatory position, I would advocate making striped bass a gamefish. But before any new steps are taken, I advocate for the ASMFC to first begin to adhere to the existing policies. If the existing policies are sufficient and being adhered to, then why is the striped bass at a 25year low? Without accountability then it's all for naught!

--
Ian Pause

Comments

From: Graham Stephens <gccstephens@gmail.com>
Sent: Friday, April 09, 2021 8:59 AM
To: Comments
Subject: [External] Atlantic Striped Bass PID - Comments

Dear Ms. Franke,

I am a Massachusetts-based recreational fisherman who participated in the MA hearing on the Atlantic Striped Bass Draft Amendment 7 PID. I am writing to share a few comments on the Amendment 7 PID.

I fish Boston Harbor and the Boston South Shore regularly from boat and from shore. Over the past four seasons in particular, I have observed a further decline in the already depleted striped bass fishery. There are fewer slot-sized or larger bass, and such bass are no longer found in much of the harbor - places where they could regularly be found even a few years ago. Large schools of bunker swim happily, no longer harassed by stripers.

As is well known, recently there has been a single large biomass of large striped bass offshore in Boston. When those fish are in, on any given day last summer, that biomass of striped bass would be harassed by over 100 recreational and charter fishing boats. I believe the implementation of a slot limit in 2020 helped to save the lives of many of those bass.

As a youth, I caught my first striped bass off of the island of Martha's Vineyard. Last year, for the first time, striped bass fishing was not allowed in the 75th annual Martha's Vineyard Striped Bass and Bluefish Derby. There is a very good reason for such drastic action. Across the Commonwealth, and indeed all along the Atlantic coast, fishermen and women realize that the great striped bass is overfished, in decline and in need of protection now.

I understand the primary question on which the Commission is seeking public comment is "How would you like the management of the Atlantic striped bass fishery to look in the future?" Unfortunately I believe that, unless further immediate measures are adopted for the entire Striper Coast to protect our beloved striped bass, there will be no future fishery to manage. Accordingly, I would fully support a complete moratorium on the recreational and commercial harvest of striped bass.

I believe most of the recreational fishing community would continue to fish for stripers under a moratorium. In fact, today, given the diminished numbers of striped bass in our waters, catching a slot sized striper is already like finding a unicorn! The economic returns from recreational striped bass fishing are significant. As I re-entered my home today to write this comment letter, I walked past my 22-foot center console boat, purchased from a local marina to fish for striped bass with my 10-year old son. I walked underneath a striped bass that hangs on my garage, carved by a local woodworker, to pay homage to the great fish. I then walked into my garage, past a wall of 20 fishing rods, at least as many reels, and many times as many fishing plugs, lures and tackle. Our Massachusetts and Atlantic Coast communities simply cannot afford to lose the economic benefits of recreational striped bass fishing. If we continue to mismanage the bass today, the bass will be gone - then there will be no shows, no more fishing trips/charters, no more consumption of media content - no more bass to catch and no more spending.

I appreciate the Commission's efforts to identify the major issues and alternatives relative to the management of the striped bass. I urge you to immediately adopt every alternative possible to minimize the harvest of striped bass.

Sincerely yours,
Graham Stephens

Comments

From: Eoin Beirne <eoinbeirne@gmail.com>
Sent: Friday, April 09, 2021 8:46 AM
To: Comments
Subject: [External] Striped Bass PID

Please consider implementing a moratorium to stop the decline in striped bass so that the recreational fishery can recover. I ask for myself and my child, who may never know what it was once like.

Thank you,

Eoin Beirne
Boston

Comments

From: Bret McGowan <bmcgowan@vicon-security.com>
Sent: Friday, April 09, 2021 8:14 AM
To: Comments
Subject: [External] Striped Bass PID

In review of the data provided for public comment it's clear the current management programs and targets won't rebuild the Striped Bass stocks within any reasonable time frame.

1. Figure 3. ***"Current estimates of female spawning stock biomass (SSB) relative to the SSB target and threshold, and recruitment (age-1 fish), 1982-2017*** "tells the truth, the trend of the spawning stock biomass is trending towards disaster for the entire east coast population and the measures taken since then to conserve the stock are not enough to rebuild. Additional restrictions, especially a moratorium on all commercial and recreational catches should be implemented ASAP. This step may seem draconian to some folks but history tells us what we need to know. Only a short few decades ago the stock was allowed to be wiped out even through conversation "measures" were in place. They were simply ineffective and not enforced. The results then required the closure of the fishery for a long time. The time frame for closure of the fishery can be reduced greatly if that step is taken now.
2. As surfcaster with hundreds of hours spent on the beaches of Long Island every year my observations, and recorded catch data for the New York State Surf Fishing Contest that includes multiple clubs, all point to a continued reduction in fish biomass.

Bret McGowan
516 650-5569

Comments

From: K.C. Boyle <kcboyle84@gmail.com>
Sent: Friday, April 09, 2021 8:09 AM
To: stripercomments@gmail.com
Subject: [External] Amendment 7 - Public Comments Participation

Dear ASMFC,

I'm writing to you to relay my support for responsible management of striped bass populations on the East Coast. In my opinion, responsible management within amendment 7 should center around supporting slot bass regulations for at least the next decade. I trust scientists know more about this subject than I do, and trust them to help this fish rebound as they've done in the past.

Best regards,
Kevin Boyle

--
K.C. Boyle
631-807-9555
KCBoyle84@Gmail.com

Comments

From: Peter Jenkins <peter@saltwateredge.com>
Sent: Friday, April 09, 2021 7:18 AM
To: Comments; stripercomments@gmail.com
Subject: [External] Comments on Atlantic Striped Bass Amendment 7 Public Information Document

Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am the owner of the Saltwater Edge a fishing tackle shop in Middletown, RI. I am also Chairman of the American Saltwater Guides Association an organization that believes healthy sustainable fisheries drive angler participation and therefore sales. I also serve on the Legislative Committee of The Rhode Island Saltwater Anglers Association (RISAA) which represents over 7,500 recreational anglers.

A healthy striped bass population is the linchpin to sustaining mine and other tackle shops along the striper coast. Striped bass is everyman's fish in that you can catch it from the beach, a kayak or a boat with bait, or lures, or flies and they are in our waters from April to November. Many of my customers were introduced to saltwater fishing by the striped bass.

According to data collected by the National Oceanic and Atmospheric Administration (NOAA) for the most recent year available, 2016, recreational fishing supported over 4,000 jobs and contributed over $412 million to the Rhode Island economy. That's in comparison to a value of $332 million for commercial fisheries. The economic contribution of striped bass to my shop and the recreational fishing economy in Rhode Island is difficult to understate.

I am very concerned for the ASMFC's ability as currently configured to manage the striped bass population in a sustainable manner. Being old enough to have fished through the last decline I also witnessed the subsequent rebound brought about by effective management. It was the shining star of fisheries management. I believe the current decline is largely because managers have yielded to political pressures by ignoring their own management triggers rather than looking out for the best interest of rebuilding fish stocks. The striped bass recovery from the last moratorium demonstrates if we take care of the fish the fish will take care of us. ASMFC needs to look in the mirror and learn from the past.

As a small business owner reliant on a healthy striped bass population. I can't see past the ridiculous and unchecked use of conservation equivalence by ASMFC. These proposals and resulting impacts rarely seem to be on target. Most recently, the reduction target was 18% once the CE proposals were factored in the actual reduction was 15%. I have wracked my brain and read a fair amount and don't recall or find a time when the CE impacts proposals actually exceeded the target. Raised the bar. Protected the striper. Most catastrophically, Marylands CE proposal a few years back resulted in overfishing their quota and the 2011 year class by 217%! The striped bass resource (and associated businesses) would have been on the road to recovery by now instead of being forced to double down on the 2015 year class. Be aware there is considerable and growing public distrust in the ability of ASMFC to deliver on their mission of " leaving healthy and abundant marine fisheries for the next generation to enjoy"

Issue 1: Fishery Goals and Objectives:

Remove from consideration as the 'Goals and Objectives" are appropriate. I am not in favor of regulatory flexibility as stated above I believe such flexibility has contributed to the overfishing of striped bass in the past 10 years

Issue 2. Biological Reference Points:

I support continuing to use the 1995 estimate of female SSB as stated above. I think that the target level of 125% of the estimated 1995 SSB is still attainable and is still appropriate. I feel strongly that a diverse age structure is critical to a sustainable striped bass population

Issue 3. Management Triggers and Issue 4. Stock Rebuilding Targets and Schedule:

I believe the current triggers are adequate.

Issue 4. Stock Rebuilding Targets and Schedule:

I feel strongly the 10-year rebuilding timeline needs to stay in place and that the Board is two years late in developing a Rebuilding Plan.

Issue 5. Regional Management:

Remove from consideration as the science needed is not available.

Issue 6. Conservation Equivalency:

I support eliminating CE in fisheries where overfishing is occurring.

Issue 7. Recreational Release Mortality:

At present outreach and education should be utilized until science becomes available to better inform the next steps

Issue 8. Recreational Accountability:

Remove from consideration. A complex issue that applies to all ASMFC species. We need answers but it is too big to include in this Amendment.

Issue 9. Coastal Commercial Allocation:

The landing period used for allocation is 50 years old and should be revisited by the Technical Committee.

I appreciate the opportunity to provide comments. I hope the Board seizes this opportunity to restore public trust and realize its mission of " leaving healthy and abundant marine fisheries for the next generation to enjoy"

Sincerely,

Peter Jenkins

Peter Jenkins

Owner
The Saltwater Edge
Chairman
American Saltwater Guides Association

Comments

From: Nicholas Willette <nicholas.willette8@gmail.com>
Sent: Friday, April 09, 2021 7:00 AM
To: Comments
Subject: [External] Striped bass

I have a love for this fish like no other they have helped me through some hard times and quite literally saved my life, as a recovering addict it was important for me to find something to do with my time something that I could enjoy something that would help define who I am. I found a love for the outdoors through fishing for striped bass it has taught me patience and acceptance, it's an escape from the the stress and anxiety's in the world. With that being said I am writing this to express my concerns about the striped bass populations moving forward I believe we should push for an abundance of fish and not the lower the bar I see no reason why we can't get back to a thriving population as there once was, I believe we should also have regulations that are the same coast wide as these are a migratory fish. as far as a commercial quota I think we need to adjust the numbers as going off of data from the 70s is absurd. In a perfect world I would push for a moratorium but I know this would be heavily fought against by commercial and for hire captains we need to save these fish by all means necessary I am in full support of the American saltwater guides association as I my beliefs line up with there's and I feel strongly that they care about this fishery as much as me! Thank you for your time and for your hard work to put all of this together!

Comments

From: Chris McMahon <jackandmax43@gmail.com>
Sent: Friday, April 09, 2021 6:20 AM
To: Comments
Subject: [External] Striped Bass PID

After reviewing the PID I suggest the following:

- Seasonal Closures, no targeting Striped Bass in traditional spawning areas, such as the Hudson River and enforced by local authorities.
- Issue a $25 Striped Bass stamp to fund and support collection of timely, high-confidence MRIP data.
- Ban the commercial gillnet fishery (Coast and Bay); adopt hook-and-line fishing only where commercial harvest persists.
- Include a metric to account for commercial release discard mortality (including bycatch and poaching) to ensure accurate commercial impact and accountability.
- Stronger punishments for poaching (counting black market catch against commercial quota, lifetime ban from all commercial and recreational fisheries for multiple or egregious offenders, gear forfeiture, larger fines, etc.).
- Limit treble hooks to one per artificial lure.
- Require barbs on artificial lures be flattened when used for Striped Bass.

I ask that you carefully consider making Stoped Bass a Gamefish and that the new rules are made with that in mind.

Respectfully
Chris McMahon

Comments

From: Chris Fay <cjf333@yahoo.com>
Sent: Friday, April 09, 2021 12:29 AM
To: Comments; Emilie Franke
Cc: Michael Armstrong; Dan Mckiernan; Rep. Sarah K. Peake; Sherry White; Raymond Kane; gary.nelson@mass.gov; stripercomments@gmail.com
Subject: [External] Striped Bass PID

First and foremost, I hope to see management strategies put in place that will put the best interests of the striped bass stock first before all other considerations.

Ideally, I would like to see strategies implemented that allows for an abundance of striped bass as seen within the past couple of decades, representative of all class sizes of fish. I want to see future generations have an opportunity to enjoy fishing for this important species, and if this requires that fishery managers take drastic actions across the coast at this time then I fully support those tough decisions. This fish is a vital part of our coastal economy and history, and further decimation of the stock is something that requires immediate action.

Our focus should be on the rebuilding of the stock as the #1 goal. This is going to require bold action by stakeholders, and that may result in some short-term pains for anglers for a long-term benefit for current and future generations.

I offer the following additional comments on Amendment 7:

PID ISSUE #1 – Fishery Goals & Objectives
I believe that the current goals and objectives should remain as is and this issue should be dropped from any further consideration in Amendment 7.

PID ISSUE #2 – Biological Reference Points
I believe that based upon the information available, the 1995 estimates should remain as the reference point. I'd like to see the reference point remain as is and have this issue dropped from any further consideration in Amendment 7.

PID ISSUE #3 – Management Triggers
I'd like to see the management triggers remain as is and have this issue should dropped from any further consideration in Amendment 7.

PID ISSUE #4 – Stock Rebuild Targets & Schedule
I'd like to see the current 10-year rebuilding timeline maintained. Due to a significant decline in the stock, immediate action should be taken to begin a rebuilding plan. We are on borrowed time right now with no time to waste, and we need bold action to address this important issue as quickly as possible. The future viability of striped bass is contingent upon this need being addressed.

To help the stock rebound and accelerate the process I would support a multi-year change to catch & release only across the coast. While I would prefer to bring home striped bass to the dinner table, I personally do not harvest striped bass and solely practice C&R because of the noticeable drop off in the stock. I care deeply about the environment and these fish and so do many anglers that I've talked

to over the years or heard from during discussions of Amendment 7, and we share this sentiment that we need to take a conservationist approach to rebuilding the stock and with that comes sacrifice.

PID ISSUE #5 – Regional Management
I would like to see consistency between all of the coastal states in the way we collectively approach management, as a regional approach presents too many competing interests and variables that can lead to a less predictable end result in the conservation of these fish.

PID ISSUE #6 – Management Program Equivalency (Conservation Equivalency)
Given how poorly the stock is doing right now due to overfishing, I do not feel that it is an appropriate time to be exploring varying forms of CE. It creates additional variables that make it more difficult to achieve predictable outcomes on the management of striped bass. Again, I'd like to see consistency in the management plan so that all states are on equal footing with a stable, consistent approach to addressing the underlying problems. If states are allowed to pursue CE alternatives, there must be accountability if they fall short of their goals.

PID ISSUE #7 – Recreational Release Mortality
I'd like to see further emphasis put on educating anglers on the correct handling of fish to reduced mortality rates. Fishing clubs and publications have done a great job promoting this cause, but more is needed for those outside of these channels. Consideration should be given to a short yet effective online training course that is tied to annual licensing and at a minimum, literature should be provided with all licenses purchased both online and in person.

PID ISSUE #8 – Recreational Accountability
I do not believe that the board should consider implementing RHLs at this time. This seems to be a complex issue (including the fact that MRIP data can be unreliable) that might be better addressed outside of the amendment process so I feel that this issue should be dropped from any further consideration in Amendment 7, with the exception of any CE accountability if that is pursued by states.
PID ISSUE #9 – Coastal Commercial Allocation
The data reference points for commercial allocations are very old to say the least and as described in the PID, there was likely underreporting at the time of this data in the 1970s and along with interstate selling of harvests. I feel that it would be prudent to update the commercial allocations based upon more current data so that it's reflective of the conditions we see today.
PID ISSUE #10 – Any Other Issues Concerning the Management of Atlantic Striped Bass
I'd like to see the requirement for Circle Hooks when using live bait extended to the Commercial sector.

I'd like to see additional funding for increased poaching/non-compliance enforcement across the coast including the resources that are needed to make that happen.

I'd like to see additional funding allocated to state and federal fishery managers that would allow for more robust and current data analytics by leveraging new technologies and/or techniques.

Respectfully,

Christopher Fay

21 Christine Drive

Dartmouth, MA 02747

Comments

From: Gregory Cordeiro <gregoryjcordeiro@gmail.com>
Sent: Friday, April 09, 2021 12:15 AM
To: Comments
Cc: stripercomments@gmail.com
Subject: [External] Striped Bass PID

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

I firmly believe the population of the striped bass along the eastern sea coast is under severe threat. We are in the uncomfortable position that requires us to act now and take immediate action.

Given the challenges with collecting proper empirical data, the current biological reference points, and my own personal experiences as a fisherman, it is evident that not enough is being done to protect the species.

I will be brief, but state simply;

I am in full support of implementing a 10 year moratorium on striped bass.

My reasoning is simply out of logic. If we cannot decide on accountability, we cannot manage our fisheries as you have clearly shown, we can't sufficiently collect the proper data to support how we create and establish initiatives to conserve our fisheries, then we need to STOP fishing for them and understand how to do that first. Why would we make rules and regulations on a very integral part of our eco system without a full scope and understanding of the subject?

Other initiatives I would be in full support of:

-increase in cost of saltwater fishing licenses and permits. (Use this money to support the science)

-expenditures on education of preservation at a state wide level.

-increased monitoring and game wardens handling regulation with higher fines and punishment for illegal harvesting

Thank you for your consideration.

Gregory Cordeiro

Flatwing Fishing

135 Ruggles Avenue
Newport, RI 02840
April 5, 2021

Commented [KM1]: Your address

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Comments on Atlantic Striped Bass Amendment 7 Public Information Document (PID)

Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am a recreational striped bass angler and writing to provide comments on Amendment 7. I grew up in Maryland where striped bass were a fish always considered a food fish and a strong part of the economy. My farther was not an angler however my grandfather was and I am as well. I now live in Rhode Island and am an avid fly angler for striped bass in Rhode Island and Massachusetts. I live in Newport, Rhode Island and am an active member of a few saltwater fishing clubs. Recreational fishing for striped bass is a large part of Rhode Island's Angling history and has a significant influence on tourism and our local economy.

Commented [KM2]: Personalize

I am concerned that striped bass populations are in a downward trajectory of decline, heading to levels of the 1970s and 80s. Unless we make immediate significant changes to improve spawning striped bass populations, I believe we will need another moratorium on striped bass like the moratorium of the 1970/80s. While I am not familiar with specifics of the eight issues being considered by the AMSFC, I would encourage the following:

- Manage striped bass stocks with consistent coast wide regulations for better overall stock management since it is a migratory species.
- Improve enforcement efforts to limit poaching and illegal harvest. Possibly increase budgets in this area so more enforcement is possible.
- Implement fishing tackle regulations that reduce fish mortality (circle and single barbless hooks)
- Initiate recreational angler education programs on striper biology, safe handling and release of striped bass.

Thank you for accepting my comments. I hope my comments and the others from recreational anglers you receive clearly indicate the dire status of the current striped bass fishery.

Sincerely,

Susan Estabrook

Comments Regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

By NJ Resident John Azzinaro

1. Fishery Goals and Objectives
   In addition to the currently stated Goal and Objectives of Amendment 6, it is suggested that steps be taken to Increase perceived accuracy of data metrics through the implementation and use of new technology tools leveraging partnerships with commercial and recreational stakeholders. The objective being to reduce the perception that "the data is flawed" and therefore the emotion that the management Plan is either too restrictive or not restrictive enough to meet the stated Goal.
2. Biological Reference Points
   a) Leave 1995 in place as the benchmark reference year for determining stock status.
   b) Continue to use 25% as the buffer
   c) There should be separate models for the ocean and Chesapeake fisheries
   d) Based on today's (2021) slot requirements, manage the stock for diverse age structures that would allow a trophy bass to be caught and released and a smaller better tasting fish to be kept for consumption.
3. Management Triggers
   any of the mortality triggers that require adjustment to the striped bass management program to produce measurable changes within 1 year (F> target, F> target 2 years and SSB < target) should be changed to require F < target within 3 years. It takes almost that long to see the effect of any change.
4. Stock Rebuilding Target and Schedule
   We prefer smaller incremental changes over time to gradually rebuild the stock. It provides a better foundation against annual fluctuations in mortality and recruitment. A fine tune approach versus a use of a sledge hammer.
5. Regional Management
   Simple is better. Return to Ocean and Chesapeake regional split as defined prior to Amendment 6 addendum IV until the competing two-stock model SCAA model is deemed ready roll out. Use MRIP data to allocate fishing mortality scores between the two regions.
6. Conservation Equivalency
   CE should continue to be part of the Striped Bass FMP. However, Equivalency should be clearly defined. Areas where neighboring states have different CE bag requirements e.g. Raritan/Lower Bays overlap, should be given the more restrictive limit to improve compliance and reduce unintended enforcement. I.E. NY slot follows Addendum IV limits of 28-35" while NJ used CE to make the slot 28-35". It is pretty easy to cross over the state line and have a "legal" NJ fish become illegal. Additionally, some form of exemption for boats landing "legal" fish in ocean waters and transiting to home port marinas within the overlap zone. The same would apply in Delaware Bay.
7. Recreational Release Mortality
   If the mortality rates remain high then mortality can and should be managed through gear restrictions, (ban on treble hooks, at least in northern NJ, gaffing of fish is not generally practiced) Angler education of proper handling and return techniques using YouTube and tackle shop poster campaigns would also contribute to lowering the mortality for both catch and release and outside slot returns. Reducing

Comments Regarding Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

By NJ Resident John Azzinaro

8. Recreational Accountability
   RHL's should not be implemented. RHL's do not work as seen with Fluke and Black Sea Bass. More accurate and timely MRIP data from the States would provide better insight into accountability. Development of a smart phone app to allow anglers to input metrics at time of catch including size and condition of release would provide higher MRIP input compliance and therefore higher data accuracy confidence.
9. Coastal Commercial Quota Allocation
   Amendment 7 should address commercial allocation. However, at the very least the baseline year should be moved from the very old, and likely inaccurate, 1972-1979 average landings figure to 1995 to match the recreational base line and set on a 2 year schedule.

Sincerely,

John Azzinaro
908 966 9005
jazz1151@comcast.net

Mr. Paul Edward Hagen
P.O. Box 1978
Quogue, NY, 11959
phagen@bdlaw.com

April 8, 2021

Emerson Hasbrouck
Cornell Cooperative Exten Marine Program
423 Griffing Ave. #100
Riverhead, NY 11901-3071

Maureen Davidson
NYS DEC Marine Resources
205 North Belle Mead Rd
East Setauket, NY 11733

Jim Gilmore, Director
NYS DEC Division of Marine Resources
205 N. Belle Mead Rd. Ste. 1
East Setauket, NY 11733-3456

Sen. Todd Kaminsky
New York 9th Senate District
55 Front St. Room 1
Rockville Centre, NY 11570

Re: Striped Bass Public Information Document (PID)

Dear New York Members of the Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Atlantic State Marine Fisheries Commission Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. I write to share my perspectives as a recreational fisherman with an extended family who is now raising our eighth generation on Long Island's East End. Our family has cherished our striped bass for a very long time.

I grew up on the East End and, with grandparents living along the Shinnecock Canal, I fished regularly from a very young age. Despite many days casting a line on our ocean beaches and bay fronts, I was out of college before I caught my first striped bass. Following action by Congress and the ASMFC in the late 1980s and early 1990s, the bass returned and I have joined friends and family in casting for them ever since. Most of my recreational dollars over the past two decades have been directed to local tackle shops, marine supply stores and local guide services with a focus on striped bass. To sustain the recreational and commercial opportunities provided by this remarkable fishery, we again need the Board and the ASMFC to demonstrate the leadership necessary to ensure striped bass return to abundance in the years ahead.

Overall Comment: Our striped bass population is in steep decline. I urge the Board and the ASMFC to manage this prized fishery for abundance. Please take prompt actions to reduce fishing mortality (F) and curb both recreational and commercial impacts on the fishery until the stock is restored to an overall size and age structure adequate to ensure its long-term health and sustainability.

Comments on Identified Issues

Issue 1: Fishery Goals and Objectives. The current fishery goals and objectives of Amendment 6 reflect the current needs and priorities of the fishery. Amendment 7 is in many respects unnecessary in my view but should the Commission proceed, the goal of Amendment 7 should be centered on rebuilding a broad age structure and robust, self-sustaining spawning stock. In my view, critical habitats are slowly improving, particularly in the key watersheds of the Chesapeake, Delaware Bay and Hudson River. The current stock decline is primarily the result of overfishing and that must be remedied through further actions by the ASMFC to reduce mortality. Management stability, flexibility and regulatory consistency are secondary considerations to the overarching goal of restoring healthy stocks.

Issue 2: Biological Reference Points. The PID does not contain information justifying a change to the Biological Reference Points (BRPs). The current biomass reference points are tied to a time when fish stocks were abundant with a broad age structure. Increased fishing effort (number of anglers, length of seasons, allowed catch limits, release mortality, and commercial harvest) have all adversely impacted the health of the fishery. Easing pressure on the fishery through reduced fishing mortality (F) should be the core focus of actions by the ASMFC, not adjusting the measures for assessing the status of the stock. If action is to be taken on the reference points, it should be to build in a greater buffer or margin of precaution to account for the uncertainties associated with climate change and to reflect the ASMFC's ongoing failure to adequately manage the coast-wide population of striped bass.

Issue 3: Management Triggers and Issue 4: Stock Rebuilding Target and Schedule. The PID does not contain information that would support changes to the management triggers or rebuilding targets and timelines currently linked to the BRPs. Indeed, the triggers, targets and current schedule make clear that the ASMFC is failing to take the management measures necessary to respond to the declining stock. I urge the Board and ASMFC focus more on developing and implementing needed conservation measures within the current management and rebuilding framework.

Issue 5: Regional Management. The scientific data and understanding of the stock and the interactions of regional populations over time appears to be quite limited. From the information presented in the PID there is not yet a scientific foundation upon which to make regional management decisions. For these reasons, there is no basis for the Board to take action on this issue. Moreover, the ASMFC FMP places far too much emphasis on regional management flexibility. Regulatory flexibility and coast-wide consistency are secondary considerations to the paramount goal of restoring and maintaining a robust coast-wide stock with a diverse age structure.

Issue 6: Conservation Equivalency. The Commission must take a far more prescriptive and precautionary approach to the issue of conservation equivalency (CE). Clearly, with the documented steep decline of the stock the current practice of providing individual states with the flexibility to enact equivalent management plans is not working. CE should be eliminated completely until the stock is restored. If it is to be maintained, states should be required to provide an added precautionary mortality buffer to allowable catch limits to reduce the risk that targets for fishing mortality could be exceeded.

Issue 7: Recreational Release Mortality. The Board and Commission must invest more in actions to reduce mortality from the recreational catch and release fishery. This includes study of gear and fish handling practices that can reduce mortality, public outreach and education, and actions to limit access to the fishery at times when mortality risk may be high (e.g., during times of high water temperatures in the Chesapeake Bay and Delaware River or during critical spawning seasons on major rivers). The Commission should also consider new limits on the duration of the season during which recreational anglers are allowed to target striped bass by delaying the opening of the season or closing the season sooner to reduce pressure on the stock. Shortening the season by two weeks at the beginning and at end of the season in New York, for example, would have limited impact on the overall recreational fishery but would likely have important benefits for early or late migrating fish. Further gear restrictions should be actively explored and mandated if they are shown to reduce recreational release mortality. This might include new limits on the use of treble hooks, seasonal requirements for use of barbless hooks and/or prohibitions on the use of gaffs.

Issue 8: Recreational Accountability. The Board should adopt a more conservative or precautionary approach to assessing anticipated recreational removals as the current approach is leading to a demonstrated decline in the stock. Better metrics are needed to measure and account for the recreational impacts occurring in different states. This would seem to be an area where further study and surveys could better inform the pace and scale of recreational removals. Increased enforcement of seasonal closures and recreational size and bag limits applicable to recreational anglers would help ensure needed conservation measures are followed. States exceeding projected limits on recreational mortality should be held to account with mandated reductions in allowable recreational harvests in the following year.

Issue 9: Coastal Commercial Quota. The Amendment should look for opportunities to reduce fishing mortality overall, with the adoption of necessary limits on both the recreational and commercial fisheries. Consideration of any changes to the commercial allocation in future management decisions should be guided by the goal of restoring an adequate spawning stock needed to ensure a robust and abundant fishery.

Issue 10: Other Issues. The ASMFC should move promptly on several other fronts to restore striped bass stocks. These actions include:

- Accounting for the uncertainties of climate change on the health of the stock and taking a more conservative approach to managing the impacts of both commercial and recreational fisheries.

- Taking a more coordinated role to promoting action by federal and state agencies to protect critical habitats for striped bass, particularly spawning habitats and sea grass beds.

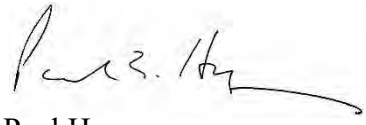
- Continued action to manage menhaden with reference to ecological reference points (ERPs) and a reduction of the allowed catch limits for menhaden in Chesapeake Bay to ensure prey species are available to striped bass and other valuable commercial and recreational fish.

- Developing new and equitable mechanisms for raising new revenue dedicated to supporting state fisheries science and enforcement.

- New coast-wide limits on the use of gill netting for striped bass in the Chesapeake and along the Atlantic Coast.

Recognizing there are near and long term social and economic considerations and pressures on the Board to act in response to near term interests, it is clear that our coastal communities will be best served by prompt and ambitious ASMFC action that reverses the years-long decline of our striped bass. As a reminder, we are today the beneficiaries of successful striped bass conservation efforts that stretch back over three centuries. The Massachusetts Bay Colony took its first steps to manage the harvest of striped bass in 1639. Many other once abundant and valuable fisheries have been lost due to inaction. I urge the Commission and Board to meet the current conservation challenge with science-based actions that will promptly rebuild our striped bass stocks for current and future generations.

Sincerely,



Paul Hagen

Cc: Emilie Franke, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Bob Danielson
86 Balin Avenue
South Setauket, NY 11720

Nathaniel H. Miller
95 Church Lane
East Hampton, NY 11937

Atlantic States Marine Fisheries Commission
comments@asmfc.org

April 9, 2021

About: Comments on Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

Dear Atlantic States Marine Fisheries Commission,

My name is Alex Cassidy, I am 12 years old and live in Norwell, MA. My uncle Patrick (I call him Uncle Hank) is a fly fishing guide on Cape Cod and he relies on catching fish as a livelihood. His company is called Cape Cod on the Fly. One day last year early in the morning he took me and my dad to Monomoy Island, off of Cape Cod. I caught eight striped bass. While the sun is still rising, it is amazing to feel the tug on your rod, reel in a fish and hold its slippery body in my hands. I never get bored while fishing. I always learn something new about the fish and have so much fun.

The Atlantic States Marine Fisheries Commission needs to pass regulations that will not harm but help the striped bass. I don't like picturing a day not being able to catch fish with my uncle because there are too few fish. I like to visualize a day when there are enough fish in the ocean so we can fish safely and we won't harm the fish when we let them go. We need to have as few fish caught and killed while still having enough for small businesses who depend on fishing.

Not only will it affect the fish themselves and the humans who eat them, killing too many fish will affect the whole ecosystem. All the animals including seals, sharks and many different types of birds will be affected if there are no fish. It's important to keep the ecosystem steady and running the way it should, for everything, including humans.

I'm writing this letter to do what I can to help save striped bass. I want to urge the commission to protect the species, not harm it. I hope to fish all my life and maybe even with my children someday. I believe in catch and release because when there are more fish, the world is more beautiful and healthy. When there are fish there is more fun in going out to the ocean. If this world wants to run smoothly and healthily, we need to protect the striped bass!

Sincerely,

Alex Cassidy


CAPE COD
MASS

123 Long Pasture Way
Tiverton, RI 02878
April 5, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Comments on Atlantic Striped Bass Amendment 7 Public Information Document (PID)

Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am a recreational striped bass angler and writing to provide comments on Amendment 7. For the last 30 years, I have regularly fished for striped bass in the Chesapeake Bay, Potomac River waters in the District of Columbia, Maine, Massachusetts, Rhode Island, Connecticut, and North Carolina. I live in Arlington, VA and Tiverton, RI. Recreational fishing for striped bass is part of my family tradition and it has spanned generations. My wife's father, my wife and our three sons all fish for striped bass.

I am concerned that striped bass populations are in a downward trajectory of decline, heading to levels of the 1970s and 80s. Over the last ten years in fishing for striped bass, I have seen a significant decline in the fishery through my experience as a frequent angler. Based on data from the ASMFC, the attached graphs illustrate my projection where spawning striped bass populations will drop to the catastrophic levels of the early eighties within the next five years.

Unless we make immediate significant changes to improve spawning striped bass populations, I believe we will need another moratorium on striped bass like the moratorium of the 1970/80s. While science and clean water have improved since then, climate change and other pressures on the ecosystem present significant challenges for healthy populations of striped bass.

What follows are my answers to the questions listed in the "*Atlantic Striped Bass PID Presentation March 2021*." My comments are based on my desire to conserve, protect, and restore a healthy striped bass fishery now and for future generations.

Issue 1: Fishery Goals and Objectives:

The existing goal should at the very least, remain the same. Given declining stocks the language "consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock" should be adjusted to acknowledge the current declining stocks. I'd recommend inserting language that acknowledges a declining striped bass fishery.

The objectives should also acknowledge the SSB declines and state that the current stocks are in jeopardy because of this. Language should reflect objectives to meet the SSB Target, not only the Threshold.

I am not in favor of regulatory flexibility since I believe that such flexibility has contributed to the decline of the striped bass fishery over the past 15 years

Issue 2. Biological Reference Points:

Continue to use the 1995 estimate of female SSB as a target. In the late 1990's, I experienced robust fisheries from the tidal Potomac River to Maine. During those years, I believed the fishery had recovered based on conservation efforts and catch limits from the 1980s. We must use those 1995 targets as a measure of a healthy striped bass fishery and seriously consider returning to the conservation efforts and catch limits of the 1980s.

Issue 3. Management Triggers and Issue 4. Stock Rebuilding Targets and Schedule:

Given the rapid decline of the fishery, I believe a commercial fishing moratorium and a mandatory catch and release regulation for recreational anglers is necessary until the fishery recovers to 1995 levels. This would simplify any of the issues raised around management triggers and would certainly rebuild the stocks as we have seen in the past.

However, if this is not an option, I support evaluating all triggers annually. If a region or circumstance exceeds a trigger, then there must be immediate consequences and corrective action taken for the following fishing season. I would also accelerate the rebuilding timeline from 10 to 5 years and create a higher recruitment threshold. Rebuilding the stocks should be the AMSFC's number one priority and more stringent management would help.

Issue 5. Regional Management:

As mentioned above, I would be in favor of a commercial moratorium and mandatory catch and release regulations for recreational anglers. If this is not possible, regional management policies that focus on stabilizing and rebuilding stocks must be a priority.

Issue 6. Conservation Equivalency:

There is too much uncertainty around Conservation Equivalency (CE). I support eliminating CE. In the current situation, any states that implement CE must be held accountable if their regulations fail to meet the stated conservation objectives. A commercial moratorium and mandatory catch and release regulations for recreational anglers would eliminate the need for CE.

Issue 7. Recreational Release Mortality:

All actions that have the potential to reduce release mortality should be considered. In addition to the use of circle hooks, single barbless hooks could reduce striped bass mortality. I would prioritize meaningful education so anglers have the information that they need to reduce release fish mortality. Anglers could watch a "safe fish" handling video prior to being issued a fishing license or take an online test to be granted a license. Both educational initiatives can be delivered online in the license purchase process. For example, in the boating sector, Massachusetts and Rhode Island provide free online educational videos and tests so boaters can receive a boating license. We can do the same for anglers and the striped bass fishery.

Issue 8. Recreational Accountability:

Too much uncertainty exists around Recreational Harvest Limits (RHL), especially given the current decline in the fishery. However, in a catch and release only recreational fishery, meaningful education efforts as mentioned in Issue 7 above can go a long way to providing some accountability to recreational anglers in a catch and release only paradigm.

Issue 9. Coastal Commercial Allocation:

Since I am in favor or a commercial moratorium and catch and release recreational angling, I'd also be in favor of tightening commercial quotas to coordinate with all of the issues being considered in the recreational fishery. The health of the striped bass stock is at a critical point right now we must reduce pressure on the fishery by eliminating or limiting harvest.

Under current conditions, the Board should consider aligning recent requirements in the recreational fishery with the commercial fishery. This includes circle hook requirements and harvest size requirements among other issues.

Issue 10. Any other topics that should be addressed in Amendment 7?

Per what's outlined throughout this PID, there is significant uncertainty from a lack of data and a time lag when data can be meaningfully analyzed to impact the health of the fishery. There is clearly a need for more science and data collection. For example, better understanding of striped bass migrations through satellite tagging and/or studies of diseases like mycobacteriosus would assist in making informed policy decisions.

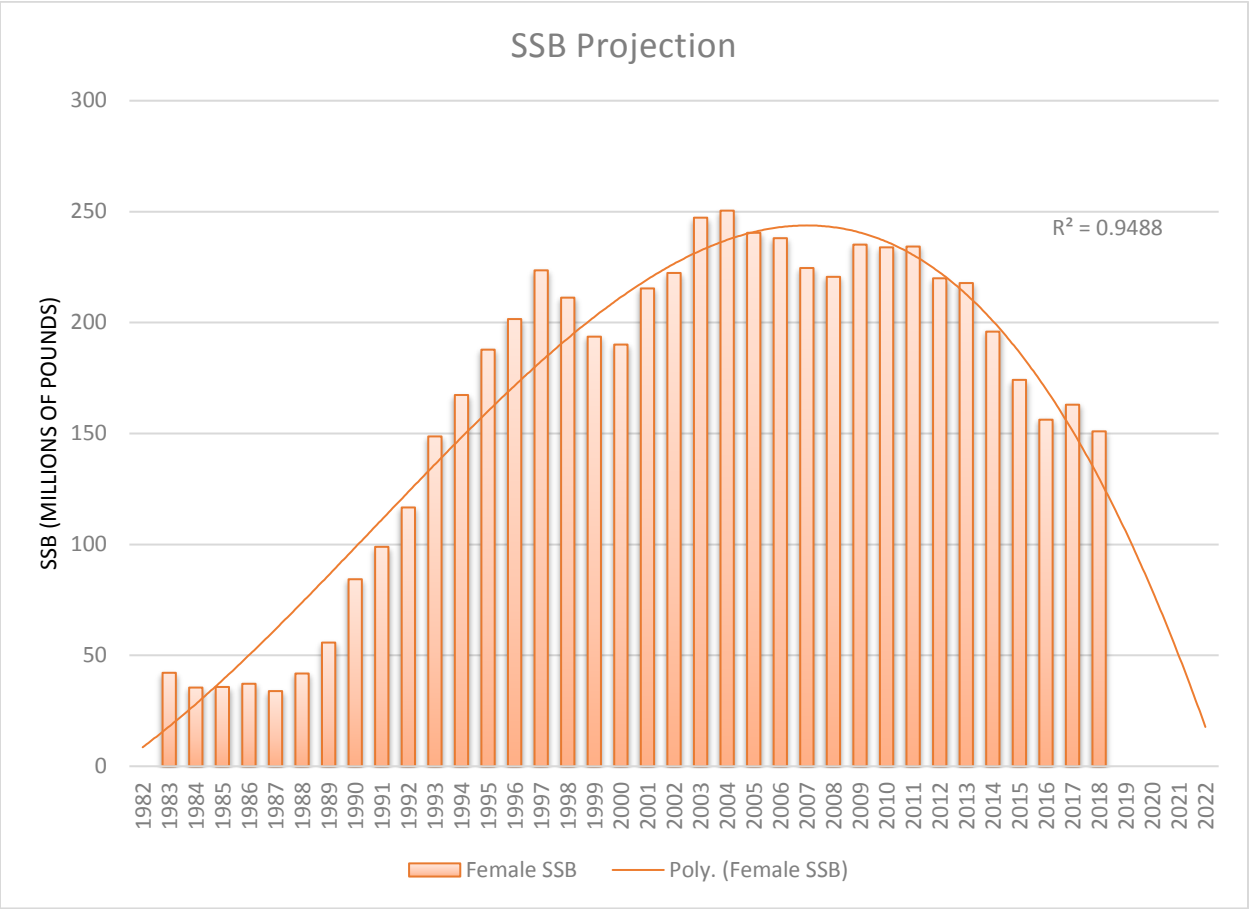
I appreciate the opportunity to provide comments. I hope the Board sees anglers like me, and the many who attended the hearings in March, as leading indicators of the health of the fishery, especially given the lack of current data. I encourage ASMFC to take immediate action to reverse the decline of our precious striped bass fishery and also see the impacts of the decline on the fishery on other elements of the ecosystem like, menhaden. Thank you for the opportunity to provide these comments.

Sincerely,

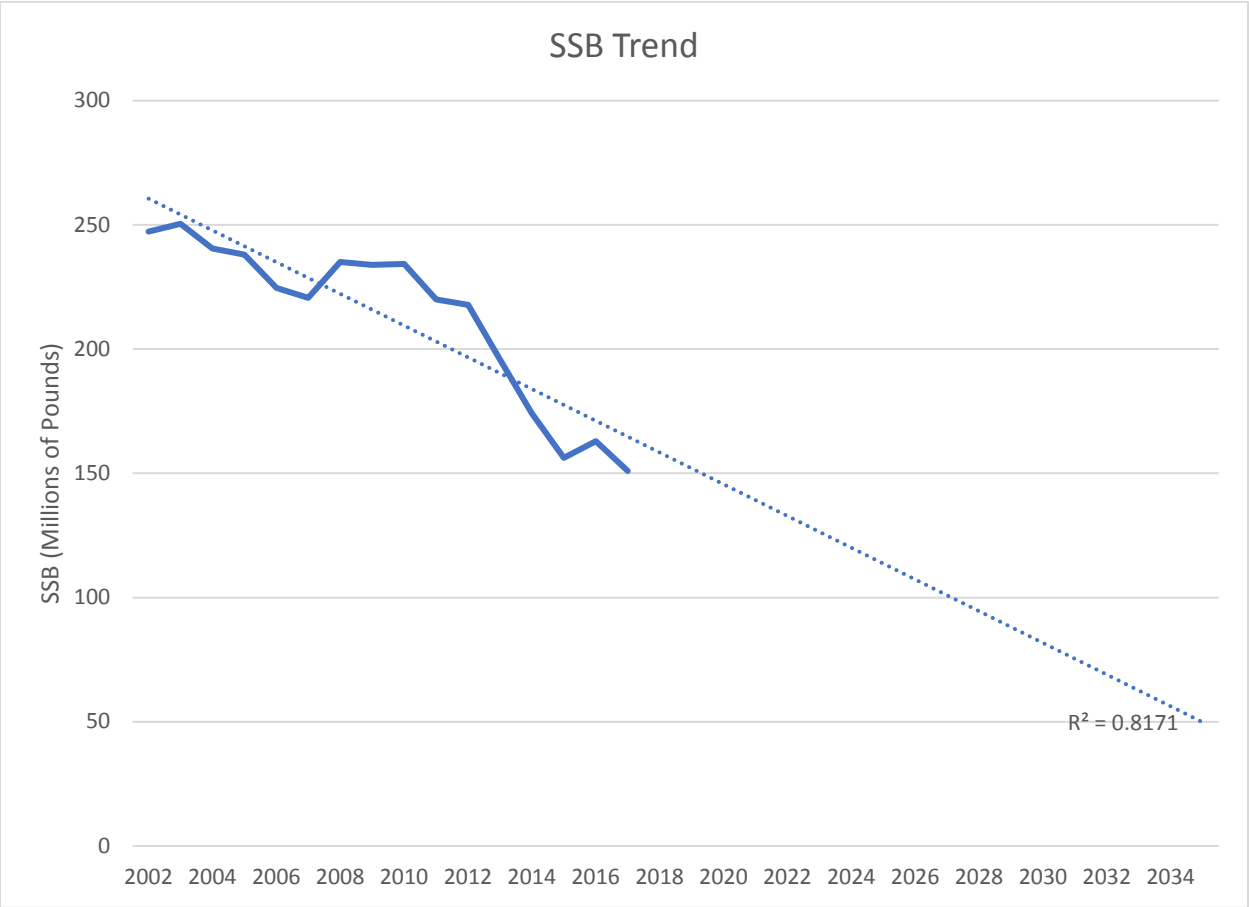


Kenneth Mendez

Cc: Striped Bass Boards--District of Columbia, Virginia, Maryland, Massachusetts, Maine, Rhode Island



This graph projects a collapse to levels of the 1980s by 2022.



Using 2002 as a starting point for SSB decline, this graph projects a collapse to levels of the 1980s by 2034.

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the PID for Amendment 7 to the Interstate Fishery Management Plan for Atlantic striped bass.

Before I move to my comments, I would like to explain who I am and what this fishery means to me. I am a 25-year-old obsessed shore based Striped Bass fly angler and have grown this passion over the past 15 years. I am all catch and release and believe the true value in a striper is as a gamefish and should be managed for abundance rather than yield. I first became obsessed with the Striped bass in the estuaries of Rhode Island as a child progressing to the Brooklyn based nocturnal fish chasing individual I am today. I plan on chasing stripers for the next 50 years. I spend thousands of dollars a year and most of my free time thinking, pursuing and preparing for Striped Bass just like many others. The recreational striped bass fishery is an economic asset all along the coast that can grow exponentially based with a healthy abundant striped bass population that is sustainably managed based on science. I fish for stripers approximately 140 days a year from mid-coast Maine to Southern New Jersey, 75% in NY, 15% RI and the rest in MA, ME and NJ. I have seen a steady decrease in the striper population and I believe more needs to be done to stop this population decline.

Below I have broken down my comments pertaining to the 10 issues presented in the PID.

1. Fishery Goals and Objectives

- In my opinion the current goals and objectives as stated in Amendment 6 continue to be appropriate. In addition, with a confirmed overfished population that is at a 25 year low we can't allow the possibility of lowering the bar or "moving the goal post." For these reasons I believe that **"Issue 1: Fishery Goals and Objectives" to be removed from further consideration for inclusion in Amendment 7.**
- The clock is ticking, the stock needs to be rebuilt as soon as possible. Where there will be a focus on broad age structure in the population for a long-term stock sustainability. A larger and more diverse spawning stock is necessary to mitigate harm of potential adverse environmental conditions. Different age fish spawn at different times allowing said adverse spawning conditions to change with the different waves. Resulting in greater consistent yearly reproduction success. Strong year classes need to be protected which the current slot fails to do. Again, these goals are in line with the previous ones declared in Amendment 7 and should not be up for debate or changed.

2. Biological Reference Points

- **I strongly believe the biological reference point of 1995 should remain unchanged and that this issue be removed from further consideration in Amendment 7.**
- 1995 was chosen for valid reasons that still hold true today: Broad spawning stock, was the year that the fishery was considered restored after collapse, availability of prey, and coastal water quality has only gotten better. Contrary to the editorial comment in the PID, the most recent stock assessment's finding that overfishing was occurring even when the stock was at this high level suggests that if fishing mortality is controlled, we should be able to achieve the current target level (125% of 1995 spawning stock biomass). In the absence of model-derived reference points 1995 is the clear chose,

choosing any year other would be arbitrary and only done in order to kill more fish. The rationale for using 1993 as a potential alternative reference year (with lower threshold and target values) "because SSB was lower than in 1995 but still produced a strong year-class" is flawed given the lack of a stock-recruitment relationship for striped bass unless the stock is at very low levels.

- Furthermore, disappointment with wording used in the PID which is supposed to be objective. On page 7 of the PID: "Given the 2018 benchmark assessment found overfishing was occurring and the SSB was below the target even during those years that the striped bass population was at historically high level, the current reference points may be unattainable given current objectives for fishery performance." This is misleading the public thinking that the striped bass carrying capacity along the coast has decreased. There is zero science to support this, not a single study. The water is cleaner, the temps are still in proper ranges to support spawning and other environmental needs, plenty of bait (it seems to be the only thing I can find most of the time bunker, sand eels, silversides, etc). Verbiage like this is wrong in a PID and misleads the public. 1995 population levels are still obtainable today nothing tells us otherwise.

3. Management Triggers

- Triggers need to be taken more seriously; the fish needs to come first not the fishery. No reason to change the management triggers. They have been triggered and inadequate action (the slot) has been taken to rebuild the stock in the mandated time line. The population clearly is in trouble, the management triggers did alarm, the issue lies with the lack of action taken to restore the overfished stock. Slot limit needs to be consistent across the coast and tweaked so it be effective and not decimate strong year classes.

4. Stock Rebuilding Targets and Schedule

- The stock should be rebuilt as quickly as possible and manage for sustained abundance. 10 years to rebuild from being declared overfish should be a promise kept. Two years since being declared overfished and the downward trend hasn't been reversed. Rebuild the population as quick as possible and be able to accurately know when important population benchmarks are achieved to track growth and decline better. We need better and more timely population data, its difficult but necessary to properly regulate the fishery.

5. Regional Management

- I am not in favor of regional management. Especially at this time with an overfished stock.
- Reasons for regional management can be achieved coast wide with two rules. Upper temperature threshold for targeting striped bass and spawning area closures. Pretty easy to make these mandates based on science, enforcement is another story seemingly always. We know where and when they spawn, and what temperature is too hot to ensure potential for proper release.

- Can't be abused as CE has been. It's one fishery across the coast. The Nursery areas need to be protected not given access to take more and smaller fish.

6. Management Program Equivalency (Conservation Equivalency)

- Simply doesn't work in our fishery, has only been abused by certain states. CE needs to be removed from the striped bass management plan, it has in part led to the overfished stock we are dealing with.

7. Recreational Release Mortality

- Teach proper release techniques. Require video with a few questions to make sure fish are handled and released properly and then people can get their state fishing license. So easy to implement seems like a no brainer if an individual doesn't get their licenses on line any store could easily implement the video/ questions.
- Restrict C&R and all fishing when water temps are too hot
- More education! More peer reviewed studies!
- More studies to be done on gear restrictions like trebles, circle hooks, etc. But more importantly teach better release practices.
- Make states take responsibility. Better enforcement, better education.

8. Recreational Accountability

- Need more studies before making any real progress in recreational accountability, but it cannot be overstated that recreational is the overwhelming majority of this fishery both financially and culturally. Need much better data before RHLs can even began to be discussed. Not the worst idea in theory but neither is conservation equivalency but without hard science and accountability they are just pipe dreams that have the potential to harm the fishery if not done correctly.
- A striper stamp or something similar could be cool coast wide to allow to fish CR and responsible harvest. Like if every angler spent $25, had to watch a 5-minute video about proper handling, gear and environmental conditions like not fishing in too hot of water. It's a migratory species, you are a coast wide interstate body, this could be real funding for real change in the Atlantic Striped Bass Population is managed.
- Gear restrictions based on science.
- Education!!!! Make sure people know how to handle and release fish before they are out on the water… legally. Proper education leads to more stewards of the fishery and coastal ecosystem as a whole.

9. Coastal Commercial Allocation

- Lower allocations based on suffering population, pause the fishery until the stock is rebuilt. Get new science to base commercial take, embarrassing to be using such old studies.
- Stop the gill netting along the south shore of LI, killing of small fish in the Chesapeake and large breeders across the coast. Management goals need to be in the recreational interest period.

- Have all commercial fishing done by rod and reel. No nets, there has been so much dead discard of trophy fish with net marks wash up along the beach of LI all fall.

10. Any other issues concerning the management of Atlantic striped bass

- Ban all commercial gillnet fishing. The waste of large fish along the south shore of LI with found on beaches with nets marks is overwhelming and disappointing. These prized fish literally trapped and thrown away as they cruise close to the beaches. The same beaches thousands of stakeholders take to relentlessly in pursuit of these magnificent creatures. Metric for commercial discard mortality because from what I have seen it seems really high.
- On most issues my views align with that of the American Saltwater Guides Association and Stripers Forever. Both organizations, myself and most every recreational striper angler I know of have the same goals. Rebuild the suffering population ASAP and manage for abundance across all sizes of fish. A stable abundant striper population managed for the recreational angler the key stake holder pouring millions of dollars to small towns and businesses across the coast.
- Coast wide Striped Bass stamp would be pretty cool. Help fund data and science (MRIP data) and could be a platform to ensure stakeholders know proper handling and release tactics utilizing video and a few simple questions. Simple enough to have the video and questions available in every language under the sun.
- Limit one treble per artificial lure or push for treble all out ban if future data shows that they are very harmful as many believe.
- I believe a 10-year moratorium should be considered if the stock is still overfished with the slot which I believe will happen. A moratorium is the most clear and effective way to meet the ASMFC's 10-stock rebuilding promise. The stock is overfished and effective sure-fire action still hasn't been taken the clock is ticking.

Thank you for taking the time to review my comments and having this period for public comments. I hope that we can save this fishery. I feel the Atlantic recreational fishery coming together having a stronger and stronger pretty unified voice. I hope ASMFC see this message and turns around this troubled fishery to an abundant sustainable stock with the lens that stripers are a prized gamefish before anything else.

For the sake of the Striper,

Peter Leary

April 9, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North High Street, Suite 200A-N
Arlington, VA 22201

RE: "Stiped Bass PID"

Dear Ms. Franke:

I have fished for over 50 years. Like many of us, I was introduced to fishing by my father and grandfather, and have fond memories of catching weakfish with them on the Delaware Bay. For the past 20 years I have had the good fortune to fish in many locations for various species. My focus these days is light tackle/fly fishing for striped bass in South Jersey coastal waters.

I have been following the recent discussions regarding striped bass and have reviewed numerous resources, including the Amendment 7 PID. I also participated in New Jersey's public hearing on March 25, 2021. My impression is that the voting majority of the regulators are commercially-biased. Recognizing the competing interests between commercial and recreational fishermen, there should be a better balance in ASMFC's voting members.

Taking into consideration my personal experiences and published information regarding the fishery, I am dismayed with the response to-date by the ASMFC. The 18% cut in October 2019 does not go far enough. Although the stock was declared overfished two years ago, I am not aware of a plan to rebuild the stock as required by Amendment 6. This is a critical concern.

Increased fishing pressure and degradation and loss of habitat in the 1970s resulted in a collapse of striped bass stock in the 1980s, but a moratorium on striper fishing, new legislation, and a new management program all contributed to an apparent striper rebound by the late 1990s.

Striped bass thrived for nearly a decade–but once again, the population is in serious decline. East Coast states have developed various proposals aimed at reducing striper mortality–particularly the mortality of the "spawning stock biomass": the

weight of females ages four years and older in the striper population. Despite these efforts, the Atlantic striped bass population appears to be in continued decline. Figure 1 of the PID indicates stripers have been in decline since 2002. Sources indicate the striped bass population is at a 25-year low. Why did it take so long for the Commission to react?

At the New Jersey meeting, I asked for a comparison of the fishery today and in the 1980s. ASMFC balked, and did not provide a meaningful response. *Stripers Forever*, indicates that the 1984 biomass is estimated to have been only 40 million pounds. Total harvest (rec + commercial) in 1984 was 1,150,000 fish. On a 1:1 basis there were roughly 34 pounds of fish in the water for every fish removed.

The 2019 biomass is estimated to have been 125 million pounds. In 2019 there were 30,900,000 fish removed from the biomass, or roughly 4 pounds of fish in the water for every fish removed.

The ASMFC's track record in managing striped bass does not inspire confidence that this important resource is getting the attention it deserves. Population data strongly suggests that the striped bass are in much worse condition today than in the 80s.

In my opinion, it's time again for a moratorium on harvesting striped bass. As the fishery recovers those who care about striped bass should be engaged in finding long-term solutions that result in healthy, sustainable fisheries for the next generation of commercial and recreational anglers.

Thank you for the opportunity to comment.

Sincerely,

Randall Scheule

rscheule@hotmail.com

April 1, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission 1050
North Highland Street, Suite 200A-N
Arlington, Virginia 22201

To: Striped Bass Management Board:

I live on the South Shore of Long Island and fish for striped bass approximately 80 days a year. Since 2013, I have seen a steady decline in the number of fish especially those over 28".

Amendment 7 should be delayed until there is updated data for the ASMFC to use in managing the fishery. Without an updated stock assessment, or MRIP data in 2020, there is not enough information to determine whether the 2020 changes to the fishing regulations are reducing mortality and rebuilding the stock. During the pandemic, there has been an unprecedented surge in fishing effort that has increased the mortality of striped bass to an even higher level than currently known by the ASMFC. According to Southwick Associates research, retail sales of tackle were up 55% in 2020, confirming a massive increase in fishing effort. The Striped Bass Management Board should wait and see all the effects of the increased effort and the stock assessment before making any changes to the FMP.

If the Striped Bass Management Board chooses to proceed with Amendment 7, please accept the following comments on issues outlined in the PID.

1-Fisheries Goals and Objectives

No change needed in Amendment 7.

The existing goals and objectives of Amendment 6 are still in line with current fishery needs and priorities. The number one priority of Amendment 7 should be to restore and maintain an age structure that provides adequate spawning potential to sustain long-term abundance of striped bass populations.

2-Biological Reference Points

No changes should be made to the reference points and this issue should be removed from the Amendment.

The current reference points are based on what scientists consider the best available science. Striped bass are overfished because fishing mortality has never been set appropriately to achieve the spawning stock biomass (SSB) target--not because the SSB reference points are wrong.

According to the ASMFC, no "model-based alternative" is available for management use, since "potential alternatives to the current reference points are restricted by data and modeling limitations." The only alternative reference point highlighted in the PID is to change the baseline year from 1995 to 1993. This would be an arbitrary and irresponsible decision.

Poor young of the year indexes in 2019 and 2020 are concerning as well and managers should prioritize conservation actions over efforts to move the goal posts mid-game.

3 Management Triggers + 4 Stock Rebuilding Targets and Schedule

No change should be made to the management triggers and rebuilding timelines.
The existing current management triggers and rebuilding timelines are consistent with the biological understanding of the species and must be maintained**.** While the management triggers could be improved by lowering the juvenile abundance index trigger for action from 3 years consecutive years to 2, overall the management triggers and rebuilding timelines are consistent with the biological understanding of the species and must be maintained.

5 Regional Management

Regional Management should be removed from the Amendment.
Until a scientific two stock model is developed that accounts for regional differences in the fishery and the fish stocks, the Board should take no action on this matter. There should be no regional management while the stock is overfished.

6- Conservation Equivalency

Conservation equivalency should be removed from the Striped Bass management plan, especially while overfishing is occurring.
The ASMFC should be striving for simpler and consistent management policies, not complex and idiosyncratic schemes. There is too much risk of not achieving the coastwide conservation goals. The PID states that "It is challenging to evaluate the effectiveness or success of CE programs once implemented because of the difficulty in separating the effects of the CE program from other factors like angler behavior and availability of fish that determine the amount of catch and release that occurs." Allowing deviation from the coastwide standard, creates regulatory inconsistency among states and within shared waterbodies.

7 Recreational Release Mortality

The Striped Bass Management Board should continue to try and reduce post release mortality.
This should be achieved through a strong state/federal funded angler education on safe release as well as continued study of gear type, e.g. mandatory circle hooks and elimination of treble hooks. With the pandemic there are more anglers than ever before. Many are new to the sport and need education on how to handle caught fish. Education would go a long way to decreasing post release mortality. Seasonal closures due to unfavorable environmental conditions should be used too.

Respectfully,

John Gans
New York

04/09/2021

Ms. Emilie Franke

Atlantic States Marine Fisheries Commission

1050 North Highland St Suite 200 A-N

Arlington, VA 22201 (via email attachment)

RE: Comments regarding questions raised in the Striped Bass Amendment 7 PID

Dear Emilie Franke,

As an avid striped bass fisherman on Cape Cod and in the Northeast I am concerned about the current stock and continued decline of that stock. My catch is down as is that of my friends. More concrete is the fact that hard fishing excellent commercial striped bass anglers cannot reach the quota and have not for several years. This is not from lack of skill or effort, it is clearly from lack of striped bass of commercial size (35 inches and greater). This also portends a lack of important breeding stock.

Others more eloquent and scientifically literate than I will respond but enclosed are my thoughts for the record as relates to the 10 questions raised.

1 Fisheries Goals and Objectives

I support the goals and objectives mostly as written but suggest adding language emphasizing the need for coastal consistency in regulation as fish and fishermen are mobile along the entire coast.

2 Biological Reference Points

The current reference points are still the best we have.

3 Management Triggers

Retain the current triggers.

4 Stock Rebuilding Targets and Schedule

Retain the current targets and schedule and reduce loopholes potentially delaying the rebuilding.

5 Regional Management

This is a coast wide stock. Remove the ability for regional abuse of the regulations and the stock especially of the coastal stock. Some regional management could be allowed for the Chesapeake Bay stock.

6 Conservation Equivalency

Again this leads to potential abuse of the regulations and stock. It also muddies the water as far as evaluating the success or failure of any attempted regulation. We already know too little about the stock and the potential success of regulation to add further variables.

7 Recreational Release Mortality

Obviously the largest factor impacting and potentially reducing the striped based stock and its ability to recover. We need to come to grips with reducing fish mortality. This means better catch and release education, fewer days fished and fewer fish targeted.

Education is helpful and a must.

I and other anglers could accept a closed season to help reduce days fished.

I and other anglers have suggested that increasing the minimum size of "legal" fish to 36 inches and scrapping the 28 to 34.99999 slot will lead to targeting fewer striped bass as the anglers probability of success goes down their effort may be reduced.

Charter Captains charter recreational anglers and thus charters should be held to this higher 36 inch or other standard as well. Their business hit in the short term is probably better than having both striped bass and their business lost forever. Again if that means all recreational anglers lose more days to fish so be it.

Consider gear changes such as barbless hooks as in catch and release trout areas, banning trebles and replacing them with in line hooks etc.

Even review the potential for Gamefish status (with a myriad of definitions) for striped bass.

8 Recreational Accountability

There are probably too many fish and fishermen to count economically and accurately. May be beyond the scope and budget to do it accurately and make it worth the effort. But consider something akin to requiring a "striper stamp" like a "snook stamp" etc. to target and retain a striped bass. The angler who wants free fish may howl but again desperate times may call for desperate measure. This will also help the education effort.

9 Coastal Commercial Allocations

Updates and "better" data should be proposed and considered.

10 Other Issues

Recreational Striped bass has a greater economic impact for tourism, dining, lodging and gear than striped bass as a commercial food source and business model for harvest. We must increase the stocks and increase long term recreational viability of the stocks. Gamefish status catch and release should be reviewed.

Improving the chance of breeding resulting in better young of the year indexes in the Chesapeake Bay must be considered especially climate change increasing water temperature. This is a big environmental to do but the weight of the striped bass fishery must align itself with others in increasing the reproductive potential in the Chesapeake Bay.

Sincerely,

William Prodouz

Recreational Angler

Past President Massachusetts Striped Bass Association

Vice President Falmouth Fishermens Association

Treasurer Buzzards Bay Anglers Club

Member Stan Gibbs Cape Cod Canal Classic Club

Dear ASMFC Striped Bass Management Board,

I respectfully submit the following comments regarding the proposed Striped Bass Amendment 7 and the identified issues to be addressed. I submit these comments as a past commercial fisherman, a lifelong recreational fisherman and a professional fisheries biologist with many years of experience with ASMFC species including striped bass . First a general comment. The stock of this species is currently in a very precarious position. The age structure is truncated, the preponderance of fish available to the fisheries are from one good year class and two average year classes. Localized depletion of individual stock components is rampart and there are far too many fish being landed to give one hope for the near term and long future of this species. Despite best management attempts over the past 10 years management has been too focused on sustaining fisheries economies and not perpetuating abundant stocks, the typical short-term approach to management. Please, less process more results!! I offer my comments regarding the outlined 10 Issues presented in the PID below.

1. Fishery Goals and Objectives

For the sake of our fisheries the word abundant needs to be inserted before stocks.

2. Biological Reference Points

The target and threshold F's should be lowered to a more conservative F=M=0.15 and F 0.20 respectively and the corresponding SSBs raised. The current fishery is running at much too high a rate for this species. Given the actual precision of management measures to reach stated targets, the unpredictable nature of recruitment and other life history parameters this species needs a much more conservative management approach than short lived and ocean spawned species.

3. Management Triggers

Quick reaction to significant changes in SSB and recruitment should be maintained in the new amendment. While stability is preferred the cyclic and extreme recruitment variance of anadromous fishes requires constant tweaking of the fishery to preserve strong year classes. A case in point, the existing recreational slot size limit, without adjustment for growth, is going to result in a significant increase in recreational harvest the next several seasons. The Board should have raised the minimum end of the slot size yearly over the next several years. Harvest is of course somewhat dependent on the bag limit but the daily bag limit of 1 fish is not controlling total take. A seasonal bag limit and matching tag system is needed to adequately control recreational harvest.

4. Stock rebuilding targets and schedule

There should be a 5-year time limit on rebuilding. Ten years allows too much time for continued stock decline and half-hearted control rules.

5. Regional management

Further model refinements are required to properly analyze this concept. The existing management model (CB vs Coast) seems to work fine.

6. Conservation Equivalency

Implement a reduction penalty for states choosing CE. I.e.: The proposing state must exceed any new reductions to harvest or F by an additional 10% or more. If local harvest levels are exceeded for 2 years a payback provision should be implemented. This will reduce the probability of exceeding new target Fs, reduce the number of options and safeguard against potential overages. Additionally, the PSE of data used for calculations by states needs to be low. Often the best intended CE plan fails from simplified assumptions regarding input data and/or changes in localized abundance.

7. Recreational release mortality

Continue the effort to estimate and control release mortality through gear types and best handling practices. While release mortality comes at a cost to the stock it is a big part this fishery and better than harvest. Some seasonal or water body restrictions may also need to be implemented for warm water, low salinity or low dissolved oxygen periods to improve survival.

8. Recreational Accountability

Implement a striped bass stamp program and annual reporting similar to the HIP program, MRIP precision is not up to the task of fine scale management. Accountability can only happen in the subsequent year anyway as input data is not real time.

9. Coastal Commercial Allocation

Reduce appropriate to new MRIP estimates of recreational harvest or lower.

Additional Comments:

Managers need to account for localized stock depletion and eliminate the incentive to increase commercial effort during periods of lowered abundance i.e. the use it or lose it concept.

Bottom line, the fishery needs to be scaled back in a big way to maintain high abundance. Trying to wrest every conceivable fish from the stock has led us to a feast or famine cycle. Both fisheries need abundant resource to be economically profitable and culturally and socially advantageous. Covid has shown us we all need access to the outdoors, nature and the solace of the water but currently there is way too much harvest of striped bass to be sustainable!!! Back off the throttle and the engine will last forever.

Sincerely,

Paul G. Caruso

42 Matthew Way

Marstons Mills, MA 02648

Dear Members of the ASMFC Atlantic Striped Bass Management Board,

My name is Brendan Richards. I am a native and current resident of Rhode Island, and 2021 is my 23rd season fishing for striped bass. I caught my first striped bass at the age of eight, and over two decades later these fish are just as special and captivating to this 31-year-old as they were to that small boy. I've caught them on lures, dead bait, live bait, and flies. I spent eight years working as first mate on one of the busiest charter boats in Point Judith. I don't just love these fish, I know these fish. As such, I preface the remainder of my comment with this statement: These fish are in trouble. The decline in their abundance is precipitous and palpable. Those of us with a connection to the coast feel the void of the bass acutely. The striped bass is of cultural and economic importance. Whatever and *every* decision this board makes, should be made with the restoration of this stock in mind.

I would like to thank the council for this opportunity for both myself and the angling public at large to comment on Amendment 7 while it is still in its most formative of stages. I have read the PID you have published and have formatted my comment in the same matter of numerically designated issues as in the PID. My comments are as follows:

ISSUE 1 Fishery Goals and Objectives:

The goals and objectives of the striped bass FMP are of no issue, as following courses of action in congruence with them would lead this overfished stock out of its current predicament. In fact, if these goals and objectives were actually followed by this council initially, the striped bass may not even be overfished *to begin with!* Therefore, the only "modification" to "goals and objectives" is that the council re-read them, think about them long and hard, and apply them better to their decision making going forward.

ISSUE 2 Biological Reference Points:

The 1995 SSB is neither just a year nor a statistic, but rather the pinnacle of restorative marine fisheries conservation. It has however been tarnished by errors in policy in the interim. The 1995 SSB was the product of regulation and policy that put conservation *first*, not the piddling half measures somewhere between conservation and the placatating of special interests who clamor for more yield in the years since (while always being closer to the latter). The years prior to 1995 were dire. Yes, our current state is less dire, but the priorities of conservation and stock rebuilding should be the same now as they were then. The 125% goal of the 1995 SSB should remain.

ISSUE 3 Management Triggers:

Management Triggers 1-4 are certainly in line with the necessary goals and objectives that manage the striped bass. However, I feel it is particularly prudent to pay particular attention to Trigger 5, due to the lackluster YOY indices of the past several years. This is a factor that needs to be considered while drafting measures to restore this stock.

ISSUE 4 Stock Rebuilding Target and Schedule:

A plan and timeline to rebuild the striped bass stock in a ten year time frame should be upheld. Furthermore, the creation of such a timeline and plan should be part of Amendment 7. Also, simply because certain negative pressures on the striped bass population are of a larger origin (climate change and alterations in forage and predation) does not provide a *carte blanche* unto humanity to throw caution to the wind. In fact, in light of these natural stressors, anglers and fisheries management should be doing *more* rather than less on their part to not inflict further stress. And frankly, climate change and predator and prey population abundance are *also* problems caused by humanity. Pointing to anthropogenic blunders outside of the council's direct jurisdiction as an excuse for their own is pathetic. It's one planet, we are one species, the striped bass is another. Let's do right by them as the more advanced one.

ISSUE 5 Regional Management:

As stated in the PID, the science is not present to inform any decision that would produce region-specific management. Therefore, to introduce this concept to striped bass management, would be to introduce an element of uncertainty in regards to its impact on Goals and Objectives. As the stock currently stands, in its overfished state, this is most certainly not the time to introduce these kinds of uncertain elements.

ISSUE 6 Management Program Equivalency (Conservation Equivalency):

Again, Conservation Equivalency introduces an element of uncertainty. The impacts of any implemented CE could very well undermine the Goals and Objectives, which is something that cannot be reasonably risked in an overfished fishery. However, if a state should implement a CE, that state should be held accountable for the failure of their CE to meet the Goals and Objectives.

ISSUE 7 Recreational Release Mortality:

Release mortality from the recreational sector is undoubtedly something that needs to be studied and considered further, because as stated in the PID, the recreational sector is the primary user group of this fishery. While there are studies regarding this issue whose results are pending, this should not prevent the board from considering actions to reduce recreational mortality. But as an experienced angler who has fished for striped bass across various fishing techniques and has had much contact with fellow anglers of varying skill levels, pointed measures such as the recent circle hook mandate are likely to do little in terms of curbing recreational release mortality. A circle hook utilized by a novice angler employing a "wait-and-bait" method may prevent some lethal hookups. However, this amounts to a "feel-good" regulation as it does little to address the real issues affecting mortality. Proper fish handling and stewardship are far more of an impact. Therefore, I feel as if it would be shrewder of the board to pursue avenues of public outreach and education regarding catch and release practices.

ISSUE 8 Recreational Accountability:

Recreational Accountability and RHL are moot points considering that the striped bass is overfished. As an overfished stock, a rebuilding plan should be created, implemented, and adhered to by all user groups unconditionally until the stock has recovered. However, once the striped bass stock is rebuilt, RHL may prove a worthwhile consideration to maintain the stock. RHL is an imperfect mechanism, but it does err on the side of conservation in many scenarios, even if that may mean frequent changes in regulations.

ISSUE 9 Coastal Commercial Quota Allocation:

While any time frame chosen for the purpose of a conservation benchmark may be arguably arbitrary, choosing one that is *50 years old* is almost definitely obsolete by the standards of today's fishery. When compared the 1995 SSB in the case of biological reference points, the 1995 SSB was chosen because this is when the stock was deemed rebuilt. Yes, this is a point defined by a series of manmade metrics, but it *is* defined by manmade metrics, which means that it adheres to an internally consistent and coherent logic. Settling on the period of 1972-1979 to determine coastal commercial allocation is *entirely* arbitrary because it is done so in the absence of any metric, as well as the internal logic one would contain. The board should work with the Technical Committee to update the means to determine commercial allocation in a way that is founded in science and is objective in relation to a metric based on solid rationale.

ISSUE 10 Other Issues:

In the future, I would like striped bass to be managed in such a way that considers the value of the stock, as well as each individual fish, in terms other than simply fish killed for one reason or another. The way the stock is managed now can be distilled down into a war of dead fish. As is typically argued, commercial "dead fish" are more valuable than recreational "dead fish." "My mortality is more lucrative than yours." These fish are *living* things. They are out there, swimming about as we speak, from the depths of our sounds to the shallows of the estuaries. And what's more, we're living things interacting with them; the striped bass are as much a part of humanity's collective life as we are theirs. Rather than managing in terms of what can be taken, I would like to see the stock managed in what can be preserved. Angling, both recreationally and commercially, is an art, a science, and a discipline. It's the third thing that really comes into play here.

Angling means dead fish, plain and simple, no matter intentionally or unintentionally. Yet, recreationally and commercially, us anglers' utmost aim is to maintain our craft in the presence of a viable biomass. Here comes discipline. A child may be on a mess of fish on a given day, in a given spot, and keep them all. They believe that their sliver of perception is the whole world through. But it's a grownups' world: big people, with big ideas, in a big place, full of far, far bigger forces. A "mess of fish" here, is not a "mess of fish" for all. Taking "one or two" here or there, for whatever reason, does add up. "Discipline" in relation to the natural world amounts to stewardship. It's the act of caring for which you benefit from. It's done from not just a sense

of responsibility, but gratitude as well. As such, the living fish are worth far more than the dead ones, and in a way that far surpasses the material confines of money. I would like this paradigm to be the future of striped bass management. It should not be about “how many can we kill without vanishing them forever” but rather “what can we do in order to engage them as anglers forever.” This is a heavy proposition with no clear means to an end, but I ask you to consider it in at least the broadest of terms.

I thank you for your time,

Brendan Richards

To: ASMFC

Subject: Amendment 7 to the Interstate Fishery Management Plan for Striped Bass

Date: April 1, 2021

I would like to express my views on the current Amendment 7 being presented and discussed. I am a Connecticut resident who has been fishing both saltwater and freshwater for more than 50 years. During the last 25 years I have been primarily surfcasting and fly fishing the shorelines of Eastern Connecticut and the South County section of Rhode Island.

I have witnessed the numbers of striped bass decline drastically during the last 15-20 years. There no longer seems to be a reliable Fall run with huge numbers of fish, it's very disturbing and depressing that the welfare of this great species is being mismanaged, and I strongly feel it is time to do something about it now!

Look at the scientific evidence of the current striped bass population, and the recent trend to make your decisions, not the interests of special groups that profit from overfishing using weak arguments to justify their positions.

When you look at the downward slope on the Spawning Stock Biomass graph, one can easily see this is heading for a disaster. We must do something – the Commission must do something for the entire Atlantic and New England seaboard. You must act before it's too late and these great fish are gone forever!!

I would like to see the striped bass classified as a gamefish, just like the tarpon has been classified in Florida. The tarpon migration on the Gulf coast draws thousands of fishermen from all over the world every year. The fish are caught, photographed and released, and the population is thriving. The tarpon guides are also thriving, making a very good living taking clients to pay top dollar for a catch and release day of fishing. Everyone accepts this, and it works! The same should be done for the striped bass. The population will rebound, and the fishery will become strong and healthy again, allowing even more charter boats to operate because the fish aren't being harvested. I would like to see a 10-year moratorium on the taking of all striped bass to allow the population of the species to recover, and then evaluate what's need to sustain the population after that.

I also believe that every state along the Atlantic coast needs to adopt the same regulations for the rebuilding program to be successful. As we all know, stripers are migratory, and if all states had different rules on slot, and bag limits, with some allowing fish to be kept and others not, the population would still be adversely impacted every Spring and Fall as they migrated past the different states. They might pass the Virginia shore in great numbers, but then, maybe in Maryland and New Jersey, they would suffer if the regulations allowed fish to be kept. Then, perhaps if New York prohibited harvesting, they would catch a break, only to be hammered again as they entered Connecticut or Rhode Island waters. The same unfortunate and unsustainable scene would play in reverse in the Fall. Please ban the harvest of all striped bass for 10 years. I guarantee you'll see the population enter a healthy recovery very soon.

Regarding some of the points I feel most strongly about regarding Amendment 7, I would like to state the following:

Issue 2: I believe that 1995 is an appropriate reference year and I recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 4: I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 6: I believe that Conservation Equivalency (CE) should only be considered if striped bass are neither overfished nor experiencing overfishing. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Thank you for considering my opinions, the time to do the right thing, to truly make a difference in the health of the striped bass population and fishery, and to create an everlasting positive legacy for yourself, is NOW. Please act accordingly and do the right thing, it is the most important issue in front of you currently, and is important to thousands and thousands or recreational and commercial fisherman and the businesses that support them.

Sincerely,

Mike Zadrovicz

Mike Zadrovicz

50 Hinman Street

Stratford, CT 06614

mzad@optonline.net

March 20, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass.

I am a recreational angler who has passionately pursued the Atlantic Striped Bass in the estuaries, bays and open oceans of eastern Massachusetts for the past twenty-five years. My passion for this species not only comes from catching, but the art and craft of following the migration through each stage of the short, yet fruitful fishing season in eastern Massachusetts. My family and fishing community includes recreational anglers and fishing guides, small business owners, and conservation-minded watermen and women who find greater value in long-term stock abundance rather than simply maximizing harvest through either commercial or recreational quotas. During my fishing career, I have seen times of great abundance and celebrated the triumph of Striped Bass conservation efforts. Under this illusion of abundance, our collective guard was let down and indiscriminate fishing practices took root which led us to the present, where Striped Bass are yet again categorized as over-fished and are harder to find in the numbers which only a few short years ago we took for certain. It is now time for our angling community in the Northeast, Mid-Atlantic and Southern states to take a stand to preserve this treasured fishery for our children and future generations to ensure they benefit from a robust fishery and healthy marine ecosystem.

After reviewing the PID for Amendment 7, it has reinforced my belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy. Atlantic striped bass, are the most frequently recreationally targeted species under ASMFC's jurisdiction, embodies this philosophy.

In principle, I am concerned with the initiation of a comprehensive amendment process when the striped bass fishery has far more urgent needs. The stock was declared overfished nearly two years ago, and while the Atlantic Striped Bass Management Board (Striped Bass Board) took action to end overfishing through Addendum 6, there has not yet been any discussion of a rebuilding plan, despite Amendment 6's own requirement that the stock be rebuilt within 10 years of being declared overfished. Due to data uncertainties associated with the COVID-19 pandemic, it is uncertain whether Addendum 6's provisions were successful in curbing fishing mortality and putting the stock on a path to eventual recovery. Furthermore, some of the specific potential issues to be included in the amendment, such as Regional Management (Issue 5) and Recreational Release Mortality (Issue 7) are being considered for public input even as fisheries scientists are underway with research and modeling efforts to inform these issues.

Notwithstanding, I am aware that it is the will of the Striped Bass Board to move ahead with this amendment, and below we provide our thoughts on each of the issues presented in the PID.

Issue 1: Goals and Objectives

I believe that the current goal and objectives of the Atlantic Striped Bass FMP, as stated in Amendment 6, continue to be appropriate for striped bass management. A robust spawning stock characterized by a broad age structure is critical for reducing recruitment variability for a species whose spawning success largely depends on favorable environmental conditions. Stock stability is a first-order concern, far more important to our coastal fisheries than management stability or flexibility.

I believe that the goal and objectives are not the problem, but instead the fact that the Striped Bass Board has not adhered to them in its actions over the past decade.

Issue 2: Biological Reference Points

To address the issue of Biological Reference Points, I am in full support of the best available science, but recognizes that due to the absence of a stock-recruitment relationship and the fact that model-based reference points are not available, we must instead consider "empirical" reference points based on a given year. Based on my understanding of the data available, I point to 1995 is an appropriate reference year given the abundance and broad age structure of the striped bass population at that time, in accordance with Amendment 6's stated goal and objectives. Contrary to the editorial comment in the PID regarding the 2018 stock assessment, finding that overfishing was occurring even when the stock was at this high level suggests that if fishing mortality is controlled, we may well be able to achieve the current target level (125% of 1995 spawning stock biomass). The fact that the Striped Bass Board has failed to maintain a healthy striped bass stock is not a suitable reason for lowering the goalposts.

Issue 3: Management Triggers

I am of the opinion, that the four management triggers related to fishing mortality and spawning stock biomass (Triggers 1-4) included in Amendment 6 are suitable for achieving the goal and objectives of striped bass management and that—if adhered to by the Striped Bass Board—they will promote the long-term health and stability of the species. Identifying recruitment failure is critical for enabling the Striped Bass Board to anticipate future reductions in striped bass availability and adjust regulations accordingly. A metric that better buffers against inherent interannual recruitment variability, such as a three-year rolling average rather than the individual index values for each year, could be a better indicator of whether there is a problem. In addition, because such poor recruitment will eventually affect the abundance and/or size distribution of striped bass available to the fishery, we recommend that this trigger require stronger action of the Striped Bass Board than simply "to review the cause of recruitment failure and determine the appropriate management action."

Issue 4: Stock Rebuilding Target and Schedule

Due to current state of the fishery and the memory of the fishery rebuilding efforts through the late 90's and early 00's I strongly believe that the 10-year rebuilding timeline specified in Amendment 6 should be maintained. A longer rebuilding timeline would not only extend the period during which the stock is not at the target level but would also inject greater uncertainty regarding the outcome of the rebuilding process.

In the interim, I am concerned that the stock will continue to languish, and foresee that, if rebuilding is not addressed in Amendment 7, the Striped Bass Board may not elect to take action to rebuild the stock until the 2022 stock assessment update, which could restart the rebuilding timeline and extend it until 2032.

Issue 5: Regional Management

Ideally, striped bass would be managed at the individual stock level to ensure that each of the spawning populations along the U.S. east coast meets the characteristics of a healthy striped bass stock outlined in Amendment 6's goal and objectives. I urge the Striped Bass Board at this time, when the striped bass stock is at a 25-year low, should be focused on rebuilding the stock using the tools at our disposal, rather than considering a fundamental shift in management approach. Given the combination of current striped bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7. With the Striped Bass Board having recently demonstrated its lack of ability to prevent even a single stock from becoming overfished; now is not the time to consider parsing that stock into multiple management units

Issue 6: Management Program Equivalency (Conservation Equivalency)

I am not unconditionally opposed to the notion of conservation equivalency (CE) in circumstances where the striped bass population is healthy and in areas/times when the characteristics of the striped bass population are unique (e.g., smaller striped bass in Chesapeake Bay). However, I also believe that CE can be abused by individual states in a way that jeopardizes the effectiveness of coastwide conservation efforts.

I believe that CE should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives. While some states may object to such a need for accountability and point to the high levels of uncertainty inherent in state-specific MRIP estimates, we contend that if MRIP estimates are suitable for projecting removals based on CE, then they should be suitable for accountability purposes as well.

Issue 7: Recreational Release Mortality

As the PID illustrates, recreational release mortality has always been a part of the recreational striped bass fishery, and it always will be with any fishery that is primarily recreational and catch-and-release. That does not mean that it is not important to continue to work toward reducing release mortality. My community of anglers continues to support research and education to achieve that goal. The Striped Bass Board, however, must recognize that such release mortality should not be considered "waste" given the fact that many striped bass fishermen voluntarily release their catch and derive a benefit from catch-and-release fishing—an attitude that is a significant driver of the recreational striped bass fishery and economy. The high proportion of fishing mortality attributed to recreational release mortality, despite the relatively low 9% assumed post-release mortality estimate, is a testament to the immense amount of angling activity oriented around catch-and-release fishing.

Based on the research that is currently underway, sponsored by the Massachusetts Division of Marine Fisheries to conduct a multi-year assessment the impacts of various fishing methods and gear types on striped bass post-release mortality. If the Striped Bass Board is committed to acting now, we recommend that such efforts focus on outreach and education to anglers in order to promote best practices for safe release. I am not unconditionally opposed to specific effort reductions (time and area closures) should research and projections demonstrate that such actions would have a significant positive conservation impact; however, given the value I place on the opportunity to target striped bass, I would prefer to only use this approach as a last resort.

Issue 8: Recreational Accountability

I recognize that the commercial sector, which fishes under hard quotas, is far more accountable for its share of striped bass fishing mortality than is the recreational sector, and fundamentally believe that improving recreational accountability is critical for ensuring the long-term vitality of the striped bass fishery.

The issue of recreational accountability is a complex challenge that applies not only to striped bass but to all recreational species under the jurisdiction of the ASMFC. As a result, I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, except as it pertains to accountability for states that implement CE.

Issue 9: Commercial Allocation

While I generally refrain from comment on Striped Bass commercial allocation issues, it does appear that the landings period used, which dates back nearly 50 years, is woefully out of date. I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial striped bass fishery.

Issue 10: Research Needs, supported by sound Science and Data

Under Issue 5 above, I mentioned continued efforts (e.g., genetic research) to better understand the relative contributions of individual striped bass stocks to the overall coastal population targeted by anglers. I recommend that the Striped Bass Board support such stock discrimination research wherever possible, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

The striped bass is a foundational species which is pursued with a fervent, conservation minded focus within my recreational fishing community in eastern Massachusetts, extending up and down the eastern seaboard. Ensuring a healthy population is critical for my community and family's continued and future enjoyment of this fishery. I urge the Striped Bass Board to put the resource first as it navigates the Amendment 7 process.

Thank you for your consideration of my comments.

Sincerely,



Andrew T. Woodward
Recreational Angler located in Orleans, Massachusetts

Matt Mobley's Comments to ASMFC PID for Amendment 7 to the Atlantic Striped Bass FMP
April 9, 2021

Ms. Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission (ASMFC)
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Ms. Franke and ASMFC recipients:

Please enter this letter into the official record of public comments for developing the first draft of Amendment 7 to the Atlantic Striped Bass Fishery Management Plan (FMP).

This letter only contains some of my observations, analyses, and recommendations for changes in Striped Bass fisheries. I've also made public comments at the Potomac River Fisheries Commission Meeting, the Massachusetts meeting, and Maryland's meeting. This letter is submitted in addition to my earlier public comments. This letter does not supersede my earlier public comments.

My intent in this letter is to provide analytical justification for change. As you will see in the body of this letter, I have a special interest in the Potomac River's Striped Bass fishery, but my comments and analyses cover the migratory range of Striped Bass and Striped Bass fisheries.

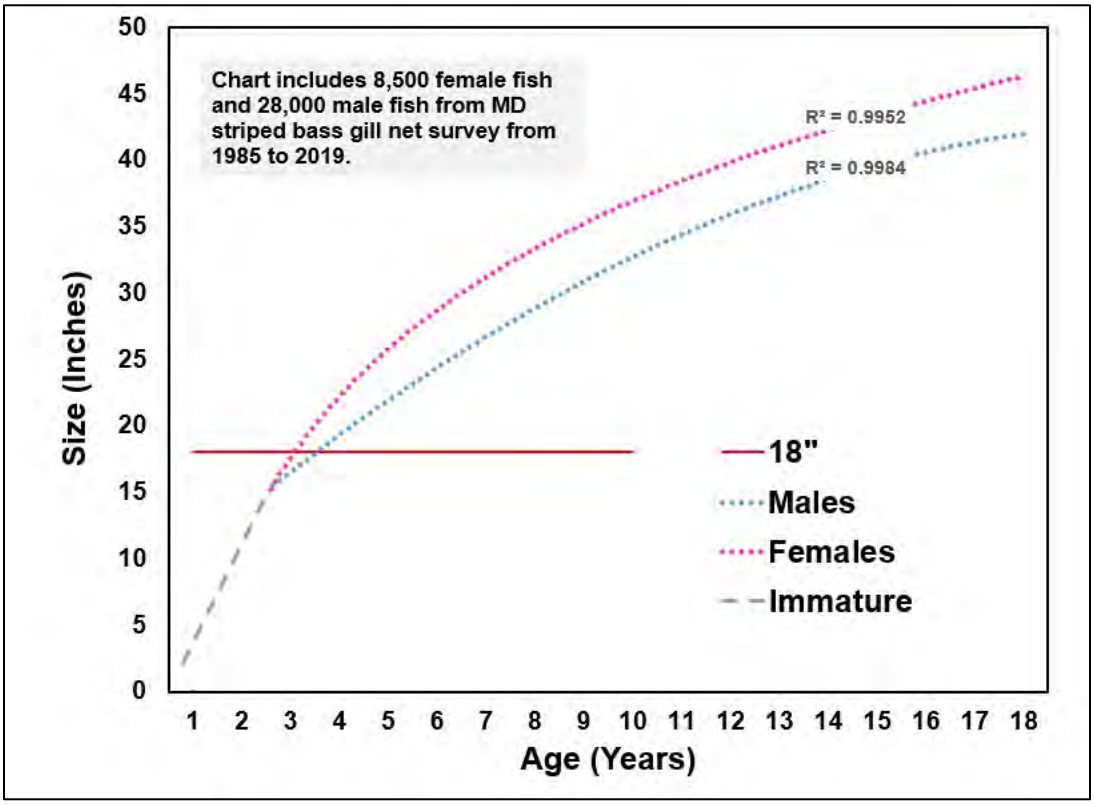
This letter is a response to Issue 10: Other Issues. The topic I will address is to "Use Better Fishery Science." Specifically, I intend to show Striped Bass fisheries are in steep decline, using relevant data. I will provide data-driven analyses to forecast the trend, and I will recommend ASMFC inform Amendment 7 decisions with my analyses. I will also make a case for more appropriate scientific accountability. For example, if ASMFC's Striped Bass Technical Committee fails to use the best available data in their analyses, the natural consequence is further decline in Striped Bass. A logical consequence is loss of public confidence in the Striped Bass Technical Committee. These are, of course, customary consequences for substandard scientific analyses. This accountability also holds true for the Striped Bass Board. If the Technical Committee provides credible objective analyses, and the Board fails to use the best available science, Striped Bass will continue to decline, and as loss of public confidence in Board members is certain.

Evidence in the paragraphs below strongly suggest ASMFC has missed the opportunity to use minor corrections to fix Striped Bass. Any further harvesting is a largely unmanageable risk, with disastrous results likely. Please consider these findings and make a good decision.

18" – 20" Striped Bass are sexually immature. By allowing an unlimited harvest of 18" – 20" fish, ASMFC is sanctioning a form of harvesting that has no scientific rationale and no successful historical precedent. No fishery has been managed successfully harvesting immature fish. Decisions to allow the harvest of 18" – 20" Striped Bass are even worse.

In Chart 1 below, I have summarized growth rates of juvenile Striped Bass. This graph is based on the size at age for thousands of fish sampled in Maryland's gillnet survey. Maryland DNR's data shows conclusively, female fish grow faster than males. Female fish are therefore recruited to Bay fisheries before male fish.

Chart 1: Comparison of Male and Female Growth Rates



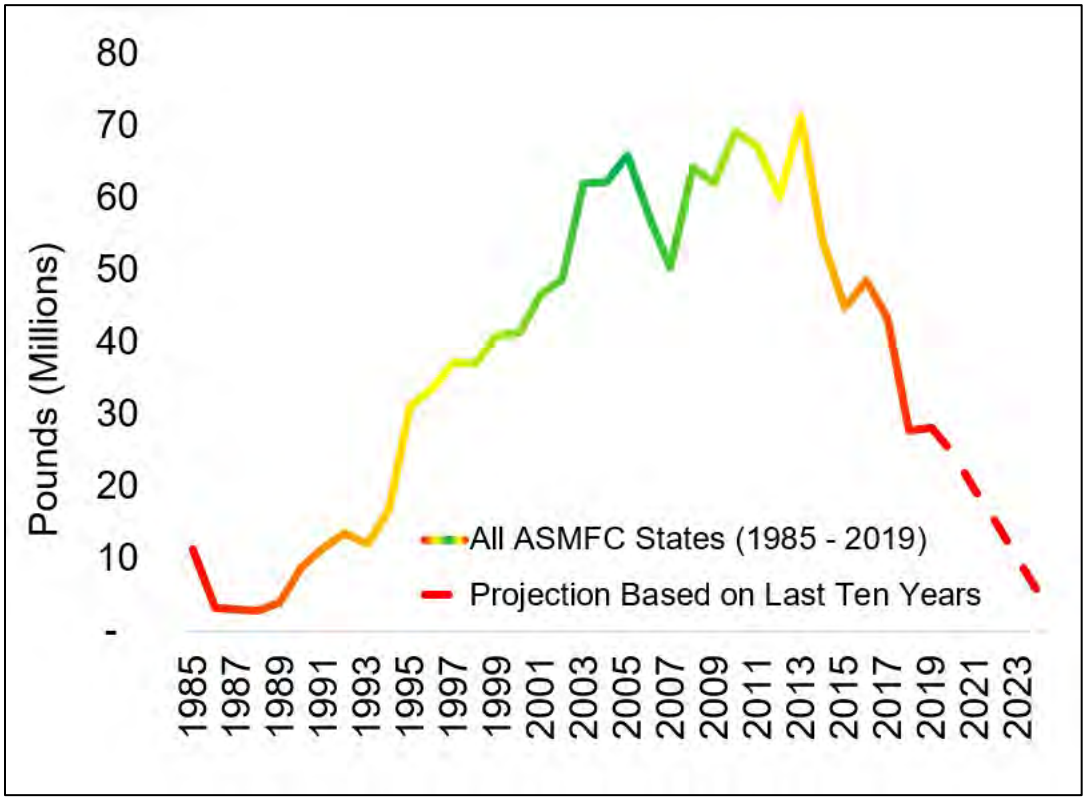
Source: Maryland DNR Gill Net Survey Data 1985 - 2019

Exposing immature female Striped Bass to overcapitalized Bay fisheries causes disproportionate harvest of females, and significantly reduces recruitment to Ocean fisheries. States that allow harvest of immature female Striped Bass have no Total Allowable Catch (TAC) for immature females. It is therefore reasonable to conclude these States allow <u>unlimited</u> harvesting of immature females. Targeting 18" – 20" fish is therefore causing a form of fishing-related gendercide that may logically be reducing recruitment of female fish to the Spawning Stock Biomass (SSB).

Recruiting female fish to the SSB is paramount to maintaining healthy Striped Bass fisheries. Each year an adequate number of 22" - 28" female fish must migrate out of the nursery areas and enter the coastal stock. By using Young of Year (YoY) as a measurement for recruitment, ASMFC is relying on recruitment data that is not a reliable indicator of fishery recruitment. By the best scientific standards, "fishery recruitment" is a minimum standard for determining population health. YoY is simply not a reliable measure of fishery recruitment, or of recruitment to the SSB. By using YoY as evidence of Striped Bass population, ASMFC has to ignore a scientific fact that many hatchlings do not live to maturity. One could argue ASMFC is using YoY data incorrectly, to show success where there is none.

To determine the accuracy of YoY as a metric for fishery success, ASMFC can easily examine time-series landings for all States in ASMFC's jurisdiction. National Oceanic and Atmospheric Administration (NOAA) landings data is a simple crosscheck for fishery production. Chart 2 below shows total landings (recreational and commercial) for all States under ASMFC 1985 – 2019. This data strongly suggests Striped Bass are in steep decline.

Chart 2: Landings Data Recreational and Commercial All States Covered by ASMFC



Source: https://www.fisheries.noaa.gov/foss

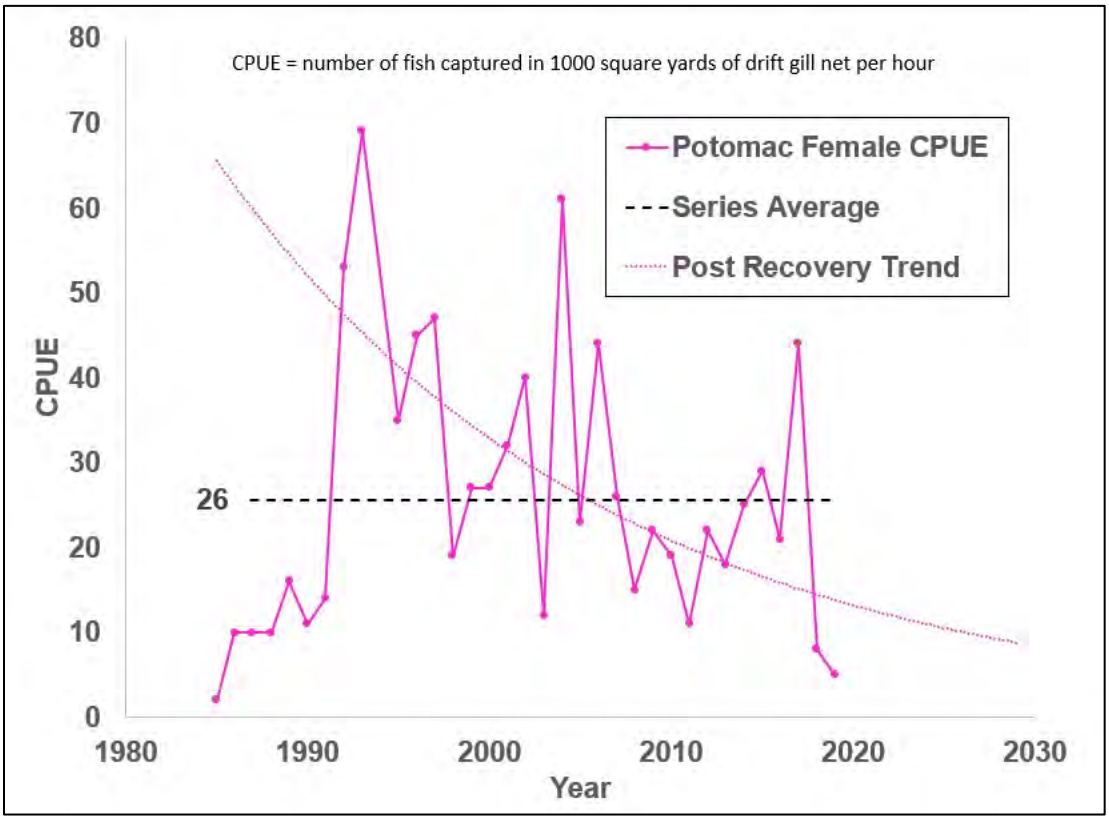
YoY do not show this decline. A simple trend through the last ten years of landings shows Striped Bass will return to pre-moratorium levels by 2025. Unfortunately, a comparison of

landings in 1985 to landings in 2019 fails to account for the increase in fishing pressure and for the improvements in technology, such as sonar and communications. While landings show an irrefutably steep decline, this decline is happening with many more people fishing for Striped Bass today, versus 1985. Fishermen are taking these fish with less effort, using better fish finders and cell phones to target fish.

Based on reasonable assumptions about fishing pressure and technology, it is necessary to closely examine Catch Per Unit of Effort (CPUE) data since 1985. To properly evaluate the velocity with which landings are declining, we must determine if CPUE shows a notable change across the time-series.

Chart 3 shows the published CPUE from the Potomac River portion of Maryland's gill net survey. This chart only shows female fish surveyed, to isolate the specific gender returning from Ocean fisheries in the spawning run, in the springtime of each year.

Chart 3: Female Striped Bass surveyed by Maryland DNR in the Potomac River



Source: https://dnr.maryland.gov/fisheries/Documents/Final%20Report%20F-61-R-14%20%202018%20-%202019.pdf

Based on the Potomac female CPUE trend, a correlation between reduced landings and CPUE clearly exists. Given this declining relationship, it is reasonable to suggest decline in landings

may be more severe than simple landings data suggests. Additionally, the actual rate of decline is probably happening faster than the rate of decline depicted in NOAA's landings data.

The foregoing paragraphs rely on data-driven analyses to show we're harvesting too many immature female Striped Bass, total landings within ASMFC cognizance are in steep decline, and CPUE data suggests the decline is worse than we know. This is compelling evidence Striped Bass are "fished out." I use this colloquial term as a segue to a final important crosscheck: what do fishermen think? As ASMFC knows, a significant number of fishermen in the PID meetings expressed passionate concern, imploring ASMFC to reduce harvesting. There were many calls for a harvesting moratorium. Very few credible (not financially motivated) sources are on record in favor of status quo.

The data driven analyses and simple crosschecks I've provided herein only begin to address my concern about Striped Bass. I am very concerned how bad my Striped Bass fishing has been in the Potomac River. We can fish all day and not see a mature fish. I'm also concerned about local rules that allow targeting and harvesting roe-laden spawning fish in Maryland's "trophy" fisheries. I'm also concerned about overharvesting and mishandling large spawning female fish in ocean fisheries. I'm concerned how clearly data corroborates my anecdotal concerns, and I'm very concerned how little attention ASMFC places on simple time-tested forms of analyses.

I recommend ASMFC install a temporary harvesting moratorium. ASMFC must address the steep decline in landings, and re-baseline the information ASMFC uses to assess fishery health. Management decisions regarding our natural resources must be based on scientific and historical facts. Failure to use facts virtually ensures Atlantic Striped Bass populations will fail. If ASMFC chooses to ignore facts, and Atlantic Striped Bass fail again, the failure will be caused by ASMFC, not fishing. ASMFC will be fully culpable, and an unprecedented public outcry is certain. If ASMFC chooses uninformed inaction, legal repercussions are likely. This is the customary consequence for bad decision-making in any form of government or industry.

I want to thank the Atlantic States Fishery Management Commission (ASMFC) for considering my comments. Participating in this process is a civic responsibility I take seriously. I sincerely hope ASMFC makes good choices in the future so we may all enjoy Atlantic striped bass fishing again.

Sincerely

Matt Mobley

ASMFC needs to take action now to rebuild. From an 80 year old fisherman who has seen the movie before.

Dick Nicholson, Member Cape Cod Salties Sportfishing Club

Ms. Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
comments@asmfc.org

RE: STRIPED BASS PID

In reference to the Striped Bass PID for Amendment 7 I offer the following comments:

Issue 1 – Fishery Goals and Objectives
The current goals and objectives seem sufficient for Amendment 7.

Issue 2 – Biological Reference Points
The 1995 reference year is appropriate and the BRPs should remain unchanged.

Issues 3 & 4 – Management Triggers, Stock Rebuilding & Target Schedule
Management triggers seem appropriate.
The 10-year rebuilding plan from Amendment 6 should absolutely be maintained. Personally, I would like to see the stock rebuilt quickly.

Issue 5 – Regional Management
Due to a lack of science surrounding stock-specific or regional management, this issue should not be considered in Amendment 7 and for the impending time remain a coast wide basis.

Issue 6 – Conservation Equivalency
Due to the current status of the Striped Bass Stock the Board should restrict the use of CE. If CE remains a solution for State fisheries the definition of "equivalency" should be more strictly defined and the States should be audited on the performance of the CE and held accountable for failures.

Issue 7 – Recreational Release Mortality
This is an issue with little science to inform. More studies on gear, catch methods and so on would be very helpful. One thing that may be effective is increased education and outreach on proper handling of fish intended to be released and best practices.

Issue 8 – Recreational Accountability
As this is a complex issue, it should be removed from consideration in the Amendment 7 process except as a method for accountability to states that implement CE.

Issue 9 – Commercial Allocation
Contrary to the recreational take, the commercial take is very well recorded. As a result the allocation should be updated to reflect current status of the stock.

Issue 10 – Other Issues
One of the biggest topics at least in the Chesapeake any region is the topic of the C&R fishery and gear types.
Moving forward I feel it would be of great value to the fishery to expand research of the effect of C&R activities and the effect different gear types have on the fish when being released, i.e. trolling, live lining, jigging/artificial lure & cut bait/bottom rig fishing.
I feel that this research could aid in further regulation on how to rebuild the stock while still allowing the fishery to be accessed by all.
Loss of prey is also an issue that could be addressed though this may not be a topic for Amendment 7. The menhaden take, specifically in the large, fish oil industry is something that needs to be addressed but this is more likely something that needs to be taken on by the State legislations.

Respectfully,

Capt. Brandon Wingate
Salt Tale Charters

Cc: Russell Dize, MJDIZE@VERIZON.NET
Michael Luisi, MICHAEL.LUISI@MARYLAND.GOV

1075 Tooker Avenue
West Babylon, NY 11704
April 9, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission'
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

Dear Ms. Franke:

I am taking this opportunity to comment on the *Public Information Document For Amendment 7 to the Interstate Fishery Management Plan For Atlantic Striped Bass* (the "PID").

My comments begin with a brief preliminary discussion of the so-called "guiding themes" described in the PID, and their relevance to past and future striped bass management. They then move to comments on each issue addressed in the PID; such comments are laid out in the order that the issues are presented in the PID, each issue first addressed in a short statement, printed in bold type, summarizing my position on each issue, followed by data and other information supporting my position and, finally, by my answers to each specific question posed with respect to the issues in the PID.

I
PRELIMINARY COMMENTS

Atlantic striped bass management should be risk-averse, based on the best available scientific information, and focused on maintaining a healthy and abundant striped bass stock in the long term. Bureaucratic concerns such as management stability or flexibility should never be allowed to delay or otherwise interfere with actions needed to halt a decline in spawning stock biomass or rectify an increase in fishing mortality.

Contrary to a statement made in the Striped Bass Work Group (the "Work Group") memorandum to the Atlantic States Marine Fisheries Commission's Atlantic Striped Bass Management Board (the "Management Board"), post-1990 striped bass management has most certainly not "largely been a story of success."[1] While the Management Board deserves full credit for rebuilding the once-collapsed striped bass stock to health by 1995, its track record since then, and particularly since the adoption of *Amendment 6 to the Interstate Management Plan for Atlantic Striped Bass* ("Amendment 6"), is anything but a story of success.

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[1] Striped Bass Work Group memorandum to Atlantic Striped Bass Management Board, dated July 28, 2020, p. 2, available at
http://www.asmfc.org/files/Meetings/2020SummerMeeting/AtlanticStripedBassBoardSupplemental.pdf

Instead, it is a story of inaction and missed opportunities, of a Management Board that failed to respond to a clear warning that the striped bass stock was on track to become overfished,[2] *twice* ignored clear language in Amendment 6 that *required* it to initiate a rebuilding plan for the striped bass stock,[3] ignored management measures that failed to constrain recreational fishing mortality in the Chesapeake Bay,[4] later adopted management measures that had a 58% probability of *failing* to achieve their goal of reducing fishing mortality to its target level,[5] and in other and similar ways has acted negligently, and in dereliction of its duties to the public and to the striped bass resource, allowing the stock to become overfished and subject to overfishing once again.

Given that history of the mismanagement of one of the most important inshore fish species on the Atlantic Coast, it is time for a paradigm shift at the Atlantic States Marine Fisheries Commission (the "Commission), which sees the Commission finally honor and act in conformity with the words of its own charter, which requires that "***Conservation programs and management measures shall be designed to prevent overfishing*** and maintain over time abundant, self-sustaining stocks of coastal fishery resources. In cases ***where stocks have become depleted as a result of overfishing and/or other causes, such programs shall be designed to rebuild***, restore, and subsequently maintain such stocks so as to assure their sustained availability in fishable abundance on a long-term basis. [emphasis added]"[6]

That being the case, the only appropriate themes for the proposed Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass ("Amendment 7") must reflect the Management Board's obligation to act in accordance with the Commission's charter, and so rebuild the striped bass

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[2] See Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board, November 8, 2011*, pp. 6-24, available at http://www.asmfc.org/uploads/file/nov2011SBBoardProceedings.pdf

[3] Atlantic States Marine Fisheries Commission, *Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass*, October 2003, p. 31, available at http://www.asmfc.org/uploads/file/sbAmendment6.pdf. Management trigger 4, which reads "If the Management Board determines that the female spawning stock biomass falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the Management Board must adjust the striped bass management program to rebuild the biomass to a level that is at or above the target within the timeframe established in *Section 2.6.2*," was tripped by the 2012 benchmark stock assessment, but no rebuilding plan was initiated. Management trigger 2, which reads "If the Management Board determines that the biomass has fallen below the threshold in any given year, the Board must adjust the striped bass management program to rebuild the biomass to the target level within the timeframe established in *Section 2.6.2*," was tripped by the 2019 stock assessment, but even in the face of an overfished stock, the Management Board failed to initiate a rebuilding plan.

[4] Atlantic Striped Bass Technical Committee memorandum to Atlantic Striped Bass Management Board, October 5, 2016, p. 5, available at http://www.asmfc.org/files/Meetings/2016AnnualMeeting/AtlanticStripedBassBoard.pdf. Such memorandum indicates that management measures intended to result in a 20.5% reduction in recreational fishing mortality in the Chesapeake Bay, pursuant to *Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan*, were not only inadequate to reduce fishing mortality to the intended level, but instead allowed such mortality to increase by approximately 58%. Provided with that information, the Management Board took no action to ensure that more effective management measures be adopted.

[5] Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board, May 5, 2020*, Comments of Dr. Katie Drew, p. 2, available at http://www.asmfc.org/files/Meetings/2020SummerMeeting/AtlanticStripedBassBoard.pdf

[6] Atlantic States Marine Fisheries Commission, *Interstate Fisheries Management Program Charter*, August 2019, p. 14, available at http://www.asmfc.org/files/pub/ISFMPCharter_Aug2019.pdf

stock and maintain such stock at sustainable levels. Concerns about issues such as management stability and flexibility should never, under any circumstances, be permitted to interfere with the effective conservation and management of the striped bass stock.

II
COMMENTS ON EACH ISSUE RAISED IN THE PID

A
ISSUE 1
FISHERY GOALS AND OBJECTIVES

The current fishery goals and objectives, particularly those related to the maintenance of a broad age structure and an abundance of older and larger fish in the population, remain appropriate given the striped bass' life history and the needs of the striped bass stock.

Having stated the above, the second objective could benefit from modification that recognizes the lack of a striped bass stock/recruitment relationship, to read "Manage fishing mortality to maintain an age structure that is capable of sustaining the long-term abundance of striped bass populations, despite the occurrence of multi-year periods in which poor spawning conditions severely reduce the number of Year 1 fish recruited into the population."

Given the role that Management Board inaction played in the decline of spawning stock biomass, the sixth objective should be reworded to read, "Adopt a management regime that requires the Management Board to respond quickly and effectively to address problems confronting the striped bass stock when they first appear and can most easily be resolved while, to the extent compatible with that objective, minimizing the need for annual changes to management measures.

Finally, the seventh and last objective should be amended to read "Establish a fishing mortality target that will maintain an abundance (pounds) of age 15 and older striped bass in the population that is no lower than the abundance of such fish that prevailed in 2017."

1
The management plan should maintain a broad age and size structure, including a significant number of age 15+ females, in the stock.

Striped bass spawning success is not dependent on the size of the spawning stock biomass. In the 2019 benchmark stock assessment, the assessors used a value of 1.0 for the steepness parameter,[7] which assumes that there is no stock/recruitment relationship at all. Instead, spawning success is dependent upon the conditions in the spawning rivers. Typically, favorable conditions only occur every few years, and there can be long intervals between successful spawns.

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[7] Northeast Fisheries Science Center. 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-08, p. 541, available at http://www.asmfc.org/files/Meetings/2019SpringMeeting/SAW66_AssessmentReport_AtlStripedBassOnly_reduced.pdf

Maryland Juvenile Striped Bass Survey data reveals that the longest spawning drought occurred during the years between 1972 and 1988, when the juvenile abundance index never rose above the current long-term average of 11.6, and was under 5.0 in eleven of those seventeen years.[8] But shorter periods of low recruitment have occurred more recently, including a period that extended from 2005 through 2010,[9] which contributed to the current low female spawning stock biomass.

Because conditions in the spawning rivers are so closely linked to striped bass spawning success, maintaining a broad age and size structure in the spawning stock is necessary in order to assure that the stock can be maintained at reasonable levels of abundance in the long term. Striped bass of different ages tend to spawn at different times, with older, larger females spawning before younger individuals. Such a spawning strategy maximizes the probability that if favorable spawning conditions occur for only a brief period of time in any year, some portion of the spawning stock would be able to take advantage of them and prevent spawning failure.[10]

In addition, because an extended period of low recruitment will result in fewer young females recruiting into the spawning stock, it is imperative to maintain enough older fish in the spawning stock to provide a buffer against such long periods of below-average spawning success.

As Dr. David H. Secor noted, "Old remnant females produced during the 1960s were a hedge against a long period of recruitment overfishing which occurred during the 1970s."[11] Such older females would provide a similar hedge against low recruitment due to climactic conditions. "Striped bass epitomize periodic strategists, spreading risk of failed replacement through variability in spawning behaviour over many spawning seasons. This life history tactic indicates that a truncated age distribution would result in stock abundance being more closely linked to annual changes in year-class strength."[12]

Thus, should there come a time in the future when most of the older females have been removed from the spawning stock, while few younger females are recruiting into it to offset such removals, the risk to the stock will increase substantially, and the risk of a 1970s-like stock collapse will become far greater. The current goals and objectives that seek to maintain a broad size and age structure in the stock, and maintain a significant number of age 15+ females in the population, will help ensure that such a situation does not occur.

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[8] Maryland Department of Natural Resources, "Juvenile Striped Bass Survey," available at https://dnr.maryland.gov/fisheries/pages/striped-bass/juvenile-index.aspx

[9] Atlantic States Marine Fisheries Commission, Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan, October 2014, p. 6, available at http://www.asmfc.org/uploads/file/54d2aa96AtlStripedBassAddendumIV_Oct2014.pdf

[10] Secor, David H., "Spawning in the nick of time? Effect of adult demographics on spawning behaviour and recruitment in Chesapeake Bay striped bass," ICES Journal of Marine Science, 57: 403-411

[11] *Ibid.*

[12] *Ibid.*

2

The management plan should encourage the Management Board to act quickly and decisively when potential threats to the stock first arise.

It is always easier to address a problem when it first arises, and can be solved with relatively minor remedial measures, than it is to wait until such problem develops into a crisis that can only be successfully addressed with heroic measures.

Unfortunately, the Management Board has historically been reluctant to address problems at their earliest stages, and waits until substantial threats to the striped bass stock arise, and even then often fails to adopt measures that are adequate to put a decisive end to such threat. As outlined in Section I to these comments, beginning in 2011, the Management Board was aware of the decline in the striped bass spawning stock biomass, and had multiple opportunities to stem and even reverse that trend. However, all such opportunities were squandered in the hope that the Management Board could maintain some sort of stability in both management measures and landings levels.

In doing so, the Management Board undermined the stability of the striped bass stock.

Thus, it becomes clear that delaying management actions, in the hope of maintaining management stability, does not promote the long-term health of the striped bass stock. That truth should be reflected in a management objective that promotes meaningful and timely management action over the bureaucratic ideal of a stable regulatory environment.

3

Response to the questions raised in connection with the goals and objectives of the management plan, as listed on page 5 of the PID

Are the existing goal and objectives of Amendment 6 still in line with current fishery needs and priorities?

Generally, yes. Maintaining a broad age and size structure will best assure the resiliency of the striped bass stock when faced with adverse conditions in the spawning rivers which continue over an extended period of time. It will also promote striped bass abundance, which should be the primary management goal in a fishery that is dominated by the recreational sector and sees a high level of catch and release.

Which specific priorities (if any) are missing from the existing goal or objectives?

An objective requiring the Management Board to act quickly and decisively to respond to a potential threat to the striped bass stock, in order to prevent such threat from having a serious impact on the stock's health.

Which of the existing objectives (if any) should be removed or refined?

The second objective should be refined to reflect the lack of a stock/recruit relationship and the importance of weather conditions on spawning, making it clear that the spawning stock structure should be capable of maintaining abundance despite consecutive years of adverse spawning conditions.

The sixth objective, which promotes regulatory stability, should be refined to make it completely clear that the desire to maintain stable regulations should never be used as justification for delaying needed management actions, and that managers should always favor taking quick and decisive action when needed over maintaining regulations that do not change over a period of years.

The seventh objective should be refined to update the reference year, and promote maintaining an abundance of age 15+ fish that is no less than the abundance prevailing in 2017.

Do the existing objectives balance the need for management stability, flexibility, and regulatory consistency?

Probably not, but that is irrelevant. *There is no true "need" for management stability or flexibility*; such considerations only promote conveniences, not necessities. The Management Board's primary responsibility is to maintain a striped bass stock that is healthy and sustainable in the long term, and the current objectives, as modified per these comments, would accomplish that. If it can do that while also maintaining management stability, flexibility, and regulatory consistency, that would be a plus. But if it cannot, then those "themes" must yield to the needs of the striped bass stock.

Which of these three themes do you value most?

Regulatory consistency, by far. Conservation equivalency will be discussed later in these comments, but as practiced by the Management Board, it has been a vehicle that allows some jurisdictions to escape their full responsibilities to conserve and manage the striped bass resource. Given that the same individual striped bass may migrate from North Carolina to Maine over the course of a season, there is little justification for making the fish run a gauntlet of different regulations that complicates both the ability of managers to conserve the stock and the ability of biologists to determine the efficacy of regulations. Management stability is a plus if it can be accomplished without compromising, in any way, the health of the striped bass stock; if that is not possible, then both it and flexibility, which is little more than an excuse for not taking action when action is called for, impair the ability of managers to maintain a healthy striped bass stock, and thus, far from being important, should be abandoned.

B

ISSUE 2

BIOLOGICAL REFERENCE POINTS

The current biological reference points should be maintained, as they support the goal and objectives of a diverse size and age structure; in addition, while they are empirical and not the result of a population model, they are based on a time when the stock was healthy, and the use of any other reference point would be arbitrary and not in the best interests of the striped bass stock.

1

Arguments in support of the current reference points

1995 was chosen as the appropriate reference year for the current empirical biological reference points because it represented at time when "many stock characteristics (such as an expanded age structure) were reached.[13] They are thus well-crafted to maintain the sort of diverse age and size structure that is important to the long-term health of the population.

There is no scientific justification for selecting any other set of empirical reference points; the biological reference points should only be changed when and if they can be calculated from a peer-reviewed population model.

In that regard, *I find it necessary to object to two passages in the PID with respect to this issue which were inappropriate, and should* ***not*** *have been included in the document.*

The first is the statement that "the current reference points may be unattainable given current objectives for fishery performance."[14] Such statement is unsupported by any objective data, and thus is without meaningful scientific support. In fact, the most recent benchmark assessment states that "F_{Target}=the projected F to maintain SSB_{Target}=0.197,"[15] suggesting that the spawning stock biomass target is very attainable, ***provided that*** fishing mortality is maintained at or below the fishing mortality target.

While it may be true that, as the PID asserts, "the SSB target has not been reached at any point during the 1982-2017 time series," even when striped bass were at their highest level of abundance, it is equally true that the Management Board has never been willing to impose the management measures necessary to achieve the fishing mortality target; achieving the needed reduction in fishing mortality is a practical prerequisite to rebuilding spawning stock biomass.

That being the case, the best scientific information suggests that the only obstacle to attaining the current spawning stock biomass reference point is a matter of will, not science. While some Management Board members might like stakeholders to believe that the current reference points are

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[13] Atlantic States Marine Fisheries Commission, *Preliminary Summary of the 2018 Benchmark Stock Assessment for Atlantic Striped Bass*, January 2019, p. 6, available at http://www.asmfc.org/files/Meetings/2019WinterMeeting/AtlanticStripedBassBoard.pdf

[14] Atlantic States Marine Fisheries Commission, *Public Information Document for Amendment 7 to the Interstate Fishery Management Plan For Atlantic Striped Bass*, February 2021, p. 7.

[15] Northeast Fisheries Science Center, 66th SAW, p. 562

unattainable, in reality, it is only their reluctance to take the needed management actions that stands between the public and a fully rebuilt striped bass stock.

The other objectionable content in this section of the PID is the statement that "the [Atlantic Striped Bass Technical Committee] discussed 1993 as a possible alternative proxy year because the SSB was lower than in 1995 but still produced a strong year class."[16] While such discussion may have taken place, it is irrelevant to the discussion of reference points because, as noted earlier, striped bass do not demonstrate a significant stock/recruitment relationship.

Thus, the discussion of the 1993 year class is misleading, because the strong year class that emerged in that year was almost certainly the result of favorable environmental conditions, not spawning stock biomass, making any linkage of 1993 SSB to the size of the 1993 year class inappropriate.

On a different note, further support for the current reference points, and in particular the use of the current fishing mortality target, can be found in the report to Congress prepared prior to the adoption of Amendment 6, which states that "at fishing mortalities higher than 0.2, the proportion of large fish in the population would decline well below the 2000 level...large fish are considered all fish greater than age 10..."[17]

While it can be argued that the model used to derive that conclusion has been supplanted by other population models that better reflect the mechanics of the striped bass population, it should be noted that in 2001, it was believed that 0.31 was an appropriate fishing mortality target, and 0.41 an appropriate threshold.[18] The best available scientific information has since reduced such target and threshold substantially. In view of such reductions, it is unlikely that the more recent population models would suggest that the fishing mortality rate needed to maintain a substantial proportion of age 10+ fish in the population would have increased during that time.

2

Answers to the questions related to the appropriate biological reference points, as listed on p. 10 of the PID.

Is the 1995 estimate of female SSB still an appropriate benchmark for determining stock status?

Yes. The 1995 estimate is appropriate because it reflects a time when the population included a broad age and size structure, which is essential to the long-term health of the stock.

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[16] Atlantic States Marine Fisheries Commission, Public Information Document, p. 8

[17] Shepherd, Gary R., *A Population Study of Atlantic Striped Bass 2001 Report to Congress*, National Marine Fisheries Service, 2001, p. 7.

[18] Atlantic States Marine Fisheries Commission, Amendment 6, p. v.

Is there a better empirical reference year or other empirical approach that should be considered?

No. The 1995 reference point is supported by several important criteria set forth in the 2018 benchmark stock assessment.[19] There are no similar criteria supporting any other reference year. In particular, because striped bass do not demonstrate a significant stock/recruitment relationship, the PID's statement that 1993 might present a viable alternative "because SSB was lower than in 1995 but still produced a strong year class" is meaningless; 1993 does not represent a viable alternative.

Is a 25% buffer appropriate for the SSB target?

The answer is not clear. It is possible that further research will indicate that such buffer should be increased to some level greater than 25%. However, until there is data supporting a change, maintaining an SSB target that is no less than 25% above the SSB threshold is an acceptable management measure.

Should the board prioritize development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components?

No. While stock-specific reference points might be of some use in determining the relative health of individual stocks, it is not clear what benefit they might provide in practice. Striped bass spawned in the Chesapeake Bay, Delaware estuary, and Hudson River mix in many different areas along the coast, and there is no practical way for an angler or commercial fishermen to distinguish among them. Thus, management measures must apply to the coastal migratory stock generally, as stock-specific measures could only be applied within the estuaries where the fish originate; even then, reference points specific to the Chesapeake Bay are inappropriate if they do not account for the impacts and needs of Chesapeake Bay-spawned fish once they exit the bay and begin migrating along the coast.

What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?

This question seems to conflate two very different concerns—the *needs* of the resource and the *desires* of the participants in the various striped bass fisheries. Such conflation, which also occurs during Management Board discussions, explains why striped bass management has been ineffective over the past decade. The proper question to ask, for Amendment 7 purposes, is "*What stock characteristics will best ensure the long-term health of the striped bass stock, and permit the long-term prosecution of sustainable striped bass fisheries?*" Such characteristics would certainly include a broad age structure and a relatively high abundance of older, larger fish in the population. Fishermen must then find ways to adjust their behavior to accommodate the needs of the stock, if they wish to continue to participate in the striped bass fishery.

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[19] Northeast Fisheries Science Center, 66th SAW, p. 462

C

ISSUES 3 AND 4

MANAGEMENT TRIGGERS AND STOCK REBUILDING TARGET AND SCHEDULE

The current management triggers 1 through 4 are appropriate and should not be changed; however, management trigger 5 seems inadequate to initiate management action quickly enough to avoid the consequences of extended periods of low recruitment, and requires revision. The requirement that the stock be rebuilt in no more than ten years is realistic, achievable, and should be retained.

1

To be effective, management triggers must require the Management Board to act promptly and decisively when spawning stock biomass drops too low or fishing mortality rises too high.

Problems facing a fishery are easier to resolve when addressed early, before they grow and create a crisis situation. Thus, management triggers 3 and 4, which require management action before a stock becomes overfished or subject to overfishing, should be retained; if the Management Board fully and decisively complies with the mandates in both of those triggers, the stock should never reach the point where it becomes overfishes or overfishing occurs. However, if the situation becomes so dire that either management trigger 1 or management trigger 2 is tripped, immediate and effective measures must be put in place; delay will only worsen an already bad situation.

In that regard, using a 50 percent probability of success, which can also be described as a 50 percent probability of failure, as a target for management measures does not adequately protect the public striped bass resource. The Management Board should, as a matter of course, strive to adopt measures with at least a 60 to 65 percent probability of achieving the measures' objectives; adopting measures with less than a 50 percent probability of success, as was the case with the recently adopted *Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan* ("Addendum VI"), is an embarrassment to the Management Board an affront to the public that has entrusted the health of the striped bass stock to the Management Board's actions.

Requiring the prompt and effective use of management triggers does conflict with the PID's "guiding themes" of management stability and flexibility. Given the importance of prompt and effective management action to the health of the striped bass stock, when such conflict occurs, it should only be resolved in favor of the striped bass, and not of bureaucratic convenience.

2

The response times required by management triggers 1 through 4 are realistic and achievable, and not inconsistent; the uncertainty associated with long-term projections militates in favor of the shortest possible rebuilding times.

Management triggers 1 through 4 incorporate two different response times; triggers 1 and 3, which address excessive fishing mortality, require fishing mortality to be lowered to or below target within one year, while triggers 2 and 4 require a depleted spawning stock biomass to be rebuilt within a timeframe

that "is ***not to exceed*** 10 years. [emphasis added]"[20] Both of those response times are reasonable, given what the triggers are meant to accomplish.

Reducing fishing mortality is an exercise in managing fishermen, not fish. Thus, it is easier to accomplish than rebuilding the striped bass stock, where environmental conditions play an important role. While efforts to reduce fishing mortality must always take natural factors into account (e.g., the spectacular failure of *Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan* ("Addendum IV") to reduce recreational fishing mortality in the Chesapeake Bay, which instead allowed such mortality to increase substantially, occurred because, in approving fishery management measures, the Management Board failed to consider the impact of the large 2011 year class on both striped bass availability and on the resultant angling effort), the Management Board retains the ultimate ability to quickly attain the fishing mortality target by adopting management measures sufficiently restrictive, taking into account all sources of scientific and management uncertainty, to do so.

Thus, it is reasonable to set a one-year deadline for returning fishing mortality to the target level.

Rebuilding spawning stock biomass to the target level is a more difficult matter, and is clearly affected by environmental and biological considerations. As noted in the PID, "striped bass are slow to mature, with 100% of females reaching maturity by age 9, and as a result, the impact of management action on SSB will not be fully realized until the protected age classes are mature."[21] Given the impact on conditions in the spawning rivers to spawning success, and the fact that favorable spawning conditions normally occur only once every few years, a 10-year ***maximum*** rebuilding time is not inappropriate for meeting the mandates of management triggers 1 and 3.

However, there is no excuse for not rebuilding the stock within the current 10-year deadline.

The Management Board has already demonstrated that it can, if it has the will to do so, rebuild a collapsed striped bass stock within a single decade, and did so under much less favorable circumstances than exist today. When it adopted *Amendment 3 to the Interstate Fishery Management Plan for Atlantic Striped Bass*[22] (Amendment 3) in October 1985, to begin the rebuilding process, the stock had already collapsed. During the period 1976-1985, which encompassed the ten spawning seasons prior to the passage of Amendment 3, the Maryland Juvenile Abundance Index ranged between 1.22 and 8.45, and averaged just under 4.3, which is well below half of the long-term average of 11.6.

Yet the stock was still rebuilt within just ten years.

Today, the spawning stock biomass is three or four times higher than it was in 1985. Over the past decade, 2011-2020, the Maryland Juvenile Abundance Index ranged between 0.89 and 34.58, and averaged about 11.25, which is very close to the long-term average. Thus, in rebuilding the stock, the Management Board would be dealing with both a far higher initial spawning stock biomass than it had in

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[20] Atlantic States Marine Fisheries Commission, Amendment 6, pp. 22, 31
[21] Atlantic States Marine Fisheries Commission, Public Information Document, p. 11
[22] Available at http://www.asmfc.org/uploads/file/StripedBassAmendment3.pdf

1985, and far better recent recruitment to support the rebuilding effort. Under such circumstances, there is no clear reason why the stock could not be rebuilt in 10 years or less.

While it may fairly be noted that the previous rebuilding effort only saw spawning stock biomass rise to what would now be the biomass threshold, and not the current target, the current size of the spawning stock, coupled with the number of younger fish already recruited into the population, suggests that reaching the target should not pose an insurmountable problem.

It is also important to emphasize that, as noted in the PID, "development of both short- and long-term rebuilding programs are informed by simulations of stock performance in the future based on assumptions of fishing mortality, recruitment, and other variables. As a result, these stock projections are inherently uncertain, particularly the farther out they project."[23] To minimize such uncertainty, rebuilding times should be made as short as reasonably possible; for such practical reason, as well as to comply with the current language of the rebuilding plan, a 10-, 7-, or even 5-year rebuilding plan would be acceptable. A plan that extends rebuilding beyond 10 years, and particularly one with an indefinite rebuilding date, would not be.

Addendum IV offers a prime example of how badly indefinite rebuilding timelines can fail. At the August 2014 Management Board meeting, then-fishery management plan coordinator Michael Waine advised the Management Board that it was sufficient to reduce fishing mortality to its target, and allow the stock to rebuild without the benefit of a rebuilding plan, because "The Board is acting to reduce F. Through that action we see the projections showing that SSB will start increasing toward its target, but we're uncomfortable with projecting out far enough to tell you when it will reach its target because the further on the projections we go the more uncertainty that is involved. Therefore, I think the trend is to get back toward the target, but we can't tell you exactly how quickly that will happen."[24]

Ironically, we now know that there was so much uncertainty involved with that prediction of eventual recovery that, in fact, reducing fishing mortality didn't cause the stock to rebuild at all; the most recent benchmark stock assessment found it to be both overfished and experiencing overfishing. Had a 10-year rebuilding plan been a part of Addendum IV, there would certainly have been some uncertainty involved, but having a plan in place would also have allowed the Management Board to monitor the rebuilding, and to make mid-course adjustments to management measures as new data was developed, dwhen the original measures prove inadequate to meet the 10-year rebuilding deadline.

Finally, there is no inconsistency between the 1-year response deadlines of management triggers 1 and 2 and the 10-year maximum rebuilding deadlines of triggers 3 and 4, nor need such deadlines require multiple changes in management measures. If the two most recent addendums to Amendment 6 had included rebuilding components, and not merely addressed fishing mortality, the fishing mortality rate could have been set, from the start, at $F_{rebuild}$, a rate lower than F_{target} and, provided that changing conditions didn't require a revision to the rebuilding plan, management stability could have been achieved by fishing at a rate no higher than $F_{rebuild}$ throughout the rebuilding period.

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[23] Atlantic States Marine Fisheries Commission, Public Information Document, p. 11

[24] Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board, August 5, 2014*, p. 10

3

Management trigger 5 needs to be revised to render it more effective; it must also compel, rather than suggest, Management Board action to address low recruitment

Management trigger 5 defines "recruitment failure" as three consecutive years when a juvenile abundance index falls below 75% of all values in the time series. Such a rare event has only occurred once in the entire 63-year history of the Maryland Juvenile Abundance Index, and that would have been in 1985, *after* Amendment 3 had been adopted and the rebuilding plan was in place. It has never occurred during the life of Amendment 6, and was not tripped despite the poor recruitment that contributed to the current state of the stock.

That being the case, the Management Board should consider revising that management trigger, perhaps to a 3-year rolling average, and/or by revising the description of "recruitment failure" to something less restrictive than values that fall within the 25th percentile in the time series. While some sort of revision is needed, the precise form that such revision should take ought to be left up to the scientists on the Atlantic Striped Bass Technical Committee, who are best positioned to determine the changes needed to render the trigger effective.

In addition, any revision should also *require* the Management Board to take action to adjust fishing mortality when low recruitment causes a decline in the spawning stock biomass. Allowing the Management Board to "determine the appropriate management action" without clear guidance from the management plan is likely to assure that no action is taken until a crisis occurs.

4

Answers to the questions related to management triggers and rebuilding timelines, as listed on p. 12 of the PID.

Which management triggers (if any) should be revisited?

Management trigger 5. As currently constituted, it is very unlikely to be tripped in time to prevent a threat to the stock caused by low recruitment. The Technical Committee should be tasked with developing a more effective standard. In addition, the trigger should compel Management Board action; failure to do so will likely assure than no action will be taken if the trigger is tripped.

What is an appropriate trigger to respond to overfishing or overfished determinations?

The current management triggers, requiring that excessive fishing mortality issues be resolved within one year and that the stock be rebuilt in no more than 10 years are both realistic and appropriate.

Should the fishing mortality-based triggers account for annual variability of fishing mortality?

No. This is the wrong place to address the annual variability question. Trying to account for annual variability in the trigger will bias the process toward excessive fishing mortality and render the trigger less effective. When this issue arises, it is always easy for managers to forget that uncertainty cuts in *both* directions. While fisheries managers are often slow to respond to a single-year estimate, and frequently argue that a point estimate which indicates that overfishing has occurred may, in reality, be overestimating fishing mortality, the opposite almost never occurs; one rarely if ever hear managers urge caution because the point estimate may be *underestimating* fishing mortality, and concealing the fact that overfishing has, in fact, already occurred. To overcome such bias, the point estimates should be taken at face value, without considering annual variability, thus making it more likely that both underestimation and overestimation of fishing mortality will receive the same treatment.

What is more important, rebuilding the stock quickly, or mitigating the impacts to fisheries?

This question creates a false dichotomy. The striped bass fishery is dominated by the recreational sector. Anglers released 92 percent of all fish caught during the period 2015-2019,[25] and there is a very close correlation between striped bass abundance and recreational effort.[26] In such a fishery, the best way to mitigate impacts on the fishery *is* to rebuild the stock quickly.

Even in the case of commercial fisheries, a quickly rebuilt fishery will give fishermen better access to product, and make it possible to increase landings. In examining this issue, managers should consider the Massachusetts commercial fishery which, due to the overfished condition of the stock and the lack of older, larger fish in the population, has been unable to catch its full allocation since 2017; in 2020, less than 53 percent of such quota was landed.[27] A fully-restored stock, featuring both abundance and a broad age structure, would better ensure that the entire quota was landed.

In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?

Significant changes that rebuild the stock quickly both confer greater benefits to fishermen sooner and minimize the likelihood that the rebuilding effort will be complicated by the additional uncertainty that is inherent in longer rebuilding times. Particularly when dealing with a primarily recreational fishery such as striped bass, the risk/reward balance is sharply inclined toward a more rapid recovery, despite the larger-scale management changes required bring it about. That is reflected in the comments of the surprisingly large minority of anglers who are willing to accept a complete moratorium on striped bass harvest in order to rebuild the stock.

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[25] Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, August 16, 2020.

[26] Data derived from personal communication from the National Marine Fisheries Service, Fisheries Statistics Division, March 14, 2021.

[27] Massachusetts Division of Marine Fisheries, "Historic commercial fishing quotas and landings," available at https://www.mass.gov/service-details/historic-commercial-fishing-quotas-and-landings

D

ISSUE 5

REGIONAL MANAGEMENT

Amendment 7 should not be allowed to outrun the best available science; given that a regional management model was rejected by the peer review panel at the 66th Stock Assessment Workshop, and no other model has passed peer review, this issue should be removed from further consideration until such time as a peer-reviewed model exists.

Should separate regional management programs be pursued for the Chesapeake Bay and the ocean region, which includes the Delaware Bay/Hudson River stock complex?

No. Absent a peer-reviewed model that can be used to inform such separate regional management programs, it would be premature to move to regional management.

In addition, from a practical standpoint, it isn't clear how such programs could be maintained separately. The Chesapeake Bay contributes the majority of fish to the coastal migratory stock. Thus, the Bay fishery and the ocean fishery are inextricably linked. What happens in the Chesapeake Bay has a direct influence on the ocean fishery; if any particular year class is overfished in the Chesapeake Bay, then that year class will not be available, in expected numbers, in the ocean fishery. If the ocean fishery removes too many older, larger females from that spawning stock, such removals could have implications for the Chesapeake Bay fishery. It would make more sense, for the good of the fish and for the fishermen, to manage striped bass as a unified stock.

If so, how should the Board determine the appropriate allocation of fishing mortality between the two regions?

No such allocation should take place. See previous answer.

Should the Board consider any other areas (e.g. Delaware River or Hudson River) for separate regional management programs?

No. Fish from those regions also contribute to the coastal migratory stock and, as a practical matter, cannot be distinguished from each other, nor from Chesapeake Bay-spawned fish, once they enter the ocean fishery. Thus, any calculation of the origin of landed fish would be based largely on speculation, and would introduce substantial uncertainty into any regional management program.

If so, what level of data should support additional regional separation?

No such separation should occur. See previous answer.

Should development of similar assessment tools be prioritized to support regional management programs for other areas of the coast?

No. The stock should be managed as a unified whole.

E

ISSUE 6

MANAGEMENT PROGRAM EQUIVALENCY (CONSERVATION EQUIVALENCY)

Conservation equivalency should be permitted only for biological reasons, and only in accordance with the Interstate Fishery Management Plan Charter (the "Charter"), which requires that any such measures "achieve the same quantified level of conservation for the resource under management."[28] Even under the best of circumstances, because conservation equivalency tries to project past levels of resource abundance and angling effort on future fishery performance, conservation-equivalent measures are likely to fail and should be viewed with profound skepticism by the Management Board.

1

Conservation equivalency with respect to striped bass has been badly misused, allowing some states to obtain special privileges for its fishermen and undercutting the effectiveness of the striped bass management plan; no conservation-equivalent measure should be approved unless if fully satisfies the definition set out in the Charter.

The Charter defines "conservation equivalency" as "Actions taken by a state which differ from the specific requirements of the [fishery management plan], but which achieve ***the same*** quantified level of conservation for the resource under management. For example, various combinations of size limits, gear restrictions, and season length can be demonstrated to achieve ***the same*** targeted level of fishing mortality. The appropriate Management Board/Section will determine conservation equivalency. [emphasis added]" Unfortunately, the Management Board has repeatedly permitted some states to adopt supposedly conservation-equivalent measures which fail to achieve that standard.

That was painfully evident with respect to both Addendum IV and Addendum VI. In the former case, the Management Board rejected a motion that would have complied with the Charter definition, by requiring state recreational equivalency measures to have the same conservation effect as Addendum IV's preferred measures of a one-fish bag and 28-inch minimum size,[29] and replaced it with one that only required that a state's supposedly conservation-equivalent management measures achieve the same 25 percent reduction that the Addendum sought to achieve on a coastwide level.[30] By doing so, states that would have experienced a greater-than-25 percent reduction if they had adopted the Addendum's preferred measures were allowed to escape their full share of the conservation burden and undermine the effectiveness of the management plan.

Such evasion rose to an even greater level in Addendum VI, when the Management Board agreed that state conservation equivalency measures only needed to meet the intended coastwide 18 percent

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[28] Atlantic States Marine Fisheries Commission, Charter, p. 23

[29] Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board, October 29, 2014*, pp. 76-77, available at http://www.asmfc.org/uploads/file/5522c757AtlStripedBassProceedings_Oct2014.pdf

[30] Ibid., pp. 78-79.

reduction.[31] As a result, the Addendum, which already had only a 50 percent probability of reducing fishing mortality to the target level,[32] was undercut so badly by states' conservation equivalency proposals that, when the Management Board's had finished approving all such proposals, its probability of success had fallen to an unacceptable 42 percent.

Because of conservation equivalency, an already-marginal 50 percent probability of success had become a 58 percent probability of failure.

2

Because fish abundance, stock structure, and fishing effort change, often very significantly, from year to year, basing future management measures on conditions that existed in the past is a practice almost certain to fail, which requires constant monitoring and regulatory changes in order to provide even a modicum of protection to the striped bass stock.

Basing size limits, bag limits, and seasons on past fishery performance is a practice that is bound to fail, particularly in the striped bass fishery, where year classes, and thus the size of the available fish, varies widely from year to year. Such regulations will typically become outdated even before they become effective precisely that reason.

Even a cursory perusal of the Maryland Juvenile Abundance Index shows the high degree of variability in year class production; the largest year class in the past 20 years occurred in 2011, with a juvenile abundance index of 34.58, which was three times the long-term average of 11.6. Yet it was bracketed by the 2010 year class, with a well below-average index of 5.58, and the 2012 year class which, with an index of 0.89, was the lowest ever recorded in a time series dating back to 1957.

Maryland's failure to reduce recreational fishing mortality by 20.5 percent, in accord with Addendum IV, also illustrates why conservation equivalency is difficult to implement. Such Chesapeake reduction used 2012 as the base year; in 2012, Maryland anglers harvested nearly 720,000 striped bass,[33] meaning that the conservation equivalent regulations adopted by Maryland pursuant to Addendum IV should have limited such anglers' landings to about 570,000 striped bass per year. But that didn't happen. Instead of reducing Maryland's recreational Chesapeake Bay landings to 570,000 fish, the new regulations actually allowed landings to increase to over 1,100,000 bass in 2015 and over 1,500,000 in 2016, after which they slowly declined to about 765,000 fish in 2019,[34] a figure still somewhat above the 2012 landings. Maryland anglers never came close to meeting the reduction mandated in Addendum IV.

It's not hard to understand why that happened. In 2012, the Maryland size limit was 18 inches overall length, and the fork length of most of the striped bass that anglers landed that year was between 17 and

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[31] Atlantic States Marine Fisheries Commission, Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board, October 30, 2019, pp. 35-37, available at http://www.asmfc.org/uploads/file/5e42d348AtlStripedBassBoardProceedings_Oct2019.pdf

[32] *Ibid*., p. 9, comments of Dr. Katie Drew.

[33] Personal communication, National Marine Fisheries Service, Fisheries Statistics Division, March 31, 2021.

[34] *Ibid*.

21 inches.[35] Fish of that size would have been three or four years old, spawned in 2008 and 2009. The Maryland Juvenile Abundance Index reveals that spawning was below average in both of those years, with values of 3.20 and 7.87, respectively, compared to a long-term average of 11.6. So in 2012, the abundance of the striped bass size classes most often landed by anglers was low.

By 2015, that picture had changed. The Maryland size limit had increased to 19 inches, the 2011 year class, with a Maryland Juvenile Abundance Index of 34.58, was the largest since 2001, and dominated the landings of Maryland anglers that year (fish between 20 and 22 inches fork length)[36]. Under such changed circumstances, regulations based on 2012 conditions not only failed to reduce Maryland anglers' fishing mortality, but allowed it to increase to the levels described above.

The Management Board's failure to require Maryland to adopt new regulations that would comply with Amendment IV's reduction allowed such excessive levels of fishing to continue for five full years.

Such situation illustrates the difficulty in crafting conservation equivalent measures that achieve their intended goals under changing conditions, and further underline why annual monitoring, and regulatory changes, are necessary to address the issues that conservation equivalency will inevitably raise.

3

Answers to questions related to management program equivalency, as listed on p. 15 of the PID?

Should CE be part of the Striped Bass FMP?

Ideally, no. To best manage the striped bass across its entire range, and to provide consistent data that will allow the Technical Committee to best evaluate the efficacy of striped bass management measures, regulations should be consistent in every state.

Should the Board restrict the use of CE based on stock status, data restrictions, differences from neighboring state, and/or any other potential issues?

Yes. Given the difficulty inherent in crafting effective conservation equivalency measures, as described in subsection 2, above, conservation equivalency should not be permitted when the striped bass stock is overfished or subject to a rebuilding plan. Increased uncertainty in state-level data should be taken into consideration, although such uncertainty can be addressed by creating regulations that are buffered to take management uncertainty into account (*i.e.*, that require a greater reduction than the coastwide reduction to account for such uncertainty) and/or by requiring states to be held accountable, using the same state data, for any overages. It would be best to avoid conditioning conservation equivalency on regulations in neighboring states, as such action could easily trigger a "race to the bottom," as each state games the conservation equivalency system in an effort to adopt regulations no more restrictive than those of its neighbors.

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[35] *Ibid.*
[36] *Ibid.*

Should the Board provide a strict definition of 'equivalency' (e.g., equal to the level of harvest the fishery would have achieved under the standard measure?

Yes, with the qualification that providing the definition shouldn't be left up to the Board; instead, the definition provided in the ISFMP Charter should be used. It is not clear where the Board derives the authority to adopt a definition of conservation equivalency that differs from that of the Charter; allowing such deviations is one reason why ASMFC management actions so often fail to achieve their goals.

Should more quantitatively rigorous and clearly defined data requirements be required as a pre-requisite for CE proposals to be considered?

All management measures, including conservation equivalency, should be based on the best available scientific information and quantitatively rigorous data requirements, provided that such data is available. Ideally, no conservation equivalent proposal that is not supported by adequate data would be approved. If they are approved, objections to holding states accountable should such measures not meet their objectives, based on arguments that the data is inadequate for such purpose, should not be entertained.

Should there be limitations to how many CE proposals a state can submit?

This matter should be left up to the Board and the Technical Committee, on a case-by-case basis. However, if states are held to the Charter's definition of "conservation equivalency," if equivalency is only permitted for biological/ecological reasons, if the uncertainty in state data is considered when conservation equivalent measures are set, and if states are held accountable should conservation equivalent measures fail to achieve their goals, the number of proposals presented by any one state is likely to be low.

Should CE be limited to time and areas with unique ecological characteristics (e.g., presence of smaller striped bass)?

Yes. Conservation equivalency should only be permitted for biological/ecological considerations, and not merely because a state is trying to find a way to let its anglers kill more or smaller fish. Having said that, whether conservation equivalency should be permitted, even to address biological/ecological disparities in a single state or region, should first be a question for the Technical Committee, which should determine whether allowing such conservation equivalent regulations would have an adverse impact on the striped bass stock, or on other states which might be dependent upon fish produced in a particular region. Only after the Technical Committee has found that conservation equivalent regulations pose no such risks, and have established any parameters necessary to prevent such risk, should conservation equivalent measures be considered.

Given state-level MRIP estimates are often less precise than regional or coastwide estimates, are these data used appropriately to develop CE proposals?

Currently, no. The heightened management uncertainty inherent in the use of state-level data should be incorporated into the conservation equivalent management measures. For example, using MRIP estimates for 2017, the PSE for striped bass landed in the North Atlantic and mid-Atlantic regions was 8.6. On the other hand, the PSE for striped bass landed in New Jersey during that year was 24.9.[37] So in calculating the adequacy of any conservation equivalent measures proposed by New Jersey, the Technical Committee should require such measures to meet not only a reduction equivalent to the reduction imposed by the 28- to 35-inch slot limit, but an *additional* reduction reflecting the greater uncertainty represented by 24.9 PSE of the state-level data compared to the 8.6 coastwide PSE.

Given the variability in recreational catch and harvest from year-to-year, how do you evaluate the effectiveness of CE programs following implementation?

The answer to this question is also the answer to the question of whether conservation equivalent management measures should ever be used. Variability in recreational catch and harvest data is due to a number of factors, including the availability of fish, angler effort, and the uncertainty in recreational data, particularly when used at the state level, or worse, at the state level with wave- and sector-level data within the state also considered. However, if the point estimates provided by the data, whatever that data might be, is considered adequate to support conservation equivalency, then the same point estimates must also be deemed adequate to support the evaluation of such measures and the imposition of accountability measures on the relevant states. Any state that would deem the data good enough to win them special privileges, but not good enough to hold them accountable, is practicing the grossest form of hypocrisy.

F

ISSUE 7

RECREATIONAL RELEASE MORTALITY

High levels of recreational release mortality are to be expected in a fishery where the majority of the participants are primarily fishing for sport, regularly practice catch and release, and overwhelmingly fish from shore or private boats, rather than from for-hire vessels. From a biological standpoint, a fish that dies after being released has no greater impact on the stock than one that dies after being intentionally retained, and from an economic standpoint, managing striped bass for abundance, even if that results in higher levels of release mortality, will result in greater angling effort and correspondingly higher economic benefits, compared to a fishery managed for yield.

[37] Personal communication, National Marine Fisheries Service, Fisheries Statistics Division, April 2, 2021

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The concern over recreational release mortality is misplaced, so long as overall fishing mortality remains at or below the fishing mortality target; the recreational striped bass fishery is primarily a catch-and-release fishery, where relatively high levels of release mortality, compared to mortality due to retention, is typical and should be expected.

The Management Board's concerns about recreational release mortality are misplaced. Such concerns should be firmly focused on reducing all forms of fishing mortality to the level needed to fully rebuild the striped bass resource within ten years. Release mortality should not be singled out.

In 2017, anglers were responsible for 90 percent of all striped bass fishing mortality.[38] For the five years between 2015 and 2019, the for-hire fishery, which tends to be more landings-oriented than the other recreational sectors, accounted for about 2 percent of all recreational striped bass trips.[39] During the same five-year period, anglers released 92 percent of all striped bass caught; in only three states, New Jersey (81 percent), New York, and Maryland (both 89 percent) did anglers release less than 90 percent of their catch.[40]

In a fishery with those characteristics, in which far more fish are released than retained, release mortality will always constitute a substantial percentage of overall fishing mortality (in that respect, it might be worthwhile to note that in many fisheries such as Florida tarpon and bonefish, that see very few fish retained, or in freshwater fisheries for wild-spawned trout where no retention is permitted, recreational release mortality approaches 100 percent of overall fisheries mortality, yet managers don't view that as any sort of a problem).

While measures such as Addendum VI's circle hook requirement, which reduces avoidable release mortality, are always worthwhile, singling out release mortality as a particular problem, when compared to other sources of mortality, makes little sense.

2

The recreational striped bass fishery should be managed as a fishery where managers seek to maximize recreational opportunity rather than landings; in such a fishery, it is acceptable to place additional restrictions on harvest if needed to accommodate a higher level of release mortality. Such management will maximize both the biological and economic benefits of the striped bass management program.

The traditional fishery management paradigm, in which managers seek to achieve landings approaching maximum sustainable yield, is not appropriate for the striped bass fishery. The typical striped bass angler pursues striped bass primarily for the fish's recreational value, not to retain them as food, although many striped bass anglers who primarily engage in catch-and-release will keep an occasional

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[38] Northeast Fisheries Science Center, 66th SAW

[39] Calculated from data provided in personal communication, National Marine Fisheries Service, Fisheries Statistics Division, April 2, 2021

[40] Calculated from data provided in personal communication, National Marine Fisheries Service, Fisheries Statistics Division, August 16, 2020

fish over the course of a season. Because of that fact, striped bass should not be managed in the same way as fish such as summer flounder or black sea bass, which anglers typically chose to catch and take home.

That difference requires the Management Board to adopt a different paradigm for striped bass management. The stock should be managed for abundance, and a broad age and size structure, rather than for yield. Such management benefits the striped bass resource, as explained in sections A through D, above. But it also provides the greatest economic benefits from the fishery, as abundance drives angling effort, and the level of angling effort corresponds to the economic benefits derived from anglers' expenditures on equipment, bait, travel, for-hire bookings, etc.

That is easily demonstrated by angling effort estimates for the period 1995 through 2014, when recreational regulations were generally stable at a 2-fish bag limit and 28-inch minimum size on the coast, and complimentary regulations in nursery areas such as the Hudson River and the Chesapeake Bay. Although regulations remained essentially stable, recreational effort varied widely, ranging from about 13 million trips in 1995, when the stock was first rebuilt, to 22 million directed striped bass trips in 2003, when the spawning stock biomass was at its near-term high. Effort actually increased to 26 million trips in 2008 as the stock began to decline, but then began to fall along with the stock, dropping just under 20 million trips in 2014.[41]

Thus, by managing for abundance and greater angler effort, and accepting the resultant release mortality, the Management Board would also be maximizing the economic return from the striped bass stock.

3

Answers to questions related to recreational release mortality, as listed on pp. 18-19 of the PID.

Should management focus on reducing the rate at which fish die after being released alive through additional gear restrictions similar to recent actions regarding the use of circle hooks (e.g., banning gaffing or the use of treble hooks)?

No. The Management Board should focus on reducing *overall* fishing mortality, including *but not limited to* recreational release mortality, to the rate needed to fully rebuild the striped bass stock, and once rebuilding is achieved, on not allowing fishing mortality to exceed the target level.

As part of its effort to reduce overall fishing mortality, the Management Board might want to consider measures such as requiring anglers to stop fishing altogether once a striped bass is retained, similar to a measure now in force in the king salmon fishery on Alaska's Kenai River,[42] in order to reduce overall fishing mortality. The Management Board might also require that larger striped bass, perhaps fish greater than 40 inches in length, be released without removing them from the water, in order to

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[41] Personal communication, National Marine Fisheries Service, Fisheries Statistics Division, April 2, 2021

[42] Alaska Department of Fish and Game, *Kenai River Complete Southcentral Regional Booklet*, p. 51, "No person, after taking a king salmon 20 inches or longer from the Kenai River, may, on that same day, fish from a boat for any species of fish in the Kenai River downstream from Skilak Lake."

minimize the stress and possible damage to internal organs that results from lifting a large fish from the water, holding it in a manner that leaves organs unsupported, the stress caused by keeping fish out of the water for extended periods to take photos, etc.; the State of Florida has adopted such a rule relating to the release of tarpon.[43]

However, the Management Board could reduce fishing mortality more efficiently and more effectively by simply adopting management measures that limit the number of striped bass that are retained.

Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released?

No. The very fact that this question is being asked makes it clear that managers still do not understand that, as a recreational *sport* fishery, the striped bass fishery should be managed to maximize effort, and so maximize recreational opportunity and economic return, and not to maximize yield. In a fishery such as the striped bass fishery, which is dominated by catch and release, if it is necessary to reduce fishing mortality, that reduction should come from regulations that primarily restrict landings, not effort.

The striped bass release mortality rate, at 9 percent, is relatively modest, lower than the estimated release mortality rates for summer flounder (10 percent), scup (15 percent), black sea bass (15 percent),[44] and bluefish (15 percent).[45] Recreational release mortality is only such a large contributor to overall fishing mortality because anglers choose to release 90 percent or more of the fish that they catch. In such a fishery, where anglers choose not to land most of their fish, effort should not be restricted in order to allow higher landings; instead, if a fishing mortality reduction is needed, landings should be restricted to maintain effort as well as the economic and social/recreational benefits that such effort provides.

Should managers consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released?

Yes, such closures should be considered by managers. The summer fishery in the Maryland portion of the Chesapeake Bay is a prime example of a fishery where such closures are needed; the brief closure currently imposed is insufficient, particularly since it is for a fixed duration, and does not bar fishing at other times when unfavorable conditions exist. If managers choose not to close fisheries when unfavorable conditions prevail, such failure should, at the least, be considered when evaluating any

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[43] Florida Administrative Code, Section 68B-32.004(b)(3), "Except for tarpon harvested or possessed with the intent to submit that tarpon for a state record or world record in accordance with subsection 68B-32.009 F.A.C., tarpon greater than 40 inches fork length may not be removed from the water."

[44] Mid-Atlantic Fishery Management Council and Atlantic States Marine Fisheries Commission, Summer Flounder, Scup, and Black Sea Bass Commercial/Recreational Allocation Amendment, Public Hearing Document, January 2021, p. 7 note 2, available at https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/6001c6c286623f3e4eac49dd/1610734740810/SFSBSB-Alloc-Am-PHD_Jan2021.pdf

[45] Northeast Fisheries Science Center. 2015. 60th Northeast Regional Stock Assessment Workshop (60th SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 15-07, p. 358, available at http://www.asmfc.org/uploads/file/55d2392c2015BluefishBenchmarkStockAssessment.pdf

proposed conservation equivalent measures, in which case the increased level of dead discards, over and above the generally accepted 9 percent release mortality rate, should be factored into the evaluation.

What are some ways to improve awareness and stewardship of the resource?

This is an interesting question because, when compared to anglers who typically seek other species, striped bass anglers tend to be more aware and more responsible stewards of the resource. They tend to turn out in higher numbers at hearings than anglers seeking other species do, tend to support needed conservation measures and, as public comment on the PID amply demonstrates, are generally willing to put the needs of the striped bass resource ahead of their ability to take striped bass home.

It could be argued that the best way for the Management Board to encourage stakeholders to be responsible stewards of the resource is for the Management Board itself to lead the way, and act decisively to conserve and rebuild the striped bass stock.

G
ISSUE 8
RECREATIONAL ACCOUNTABILITY

The Management Board will probably be unable to effectively manage and rebuild the striped bass stock unless it is willing to impose an annual, hard-poundage recreational harvest limit, and holds anglers responsible when such limit is exceeded in any year.

1

The approach used by the ASMFC to manage striped bass and other recreational fisheries, in which there are no consequences when anglers exceed either the fishing mortality target or fishing mortality threshold, lacks the imposed discipline needed to successfully prevent overfishing, rebuild overfished stocks, and then maintain such stocks at sustainable levels in the long term.

The unfortunate truth is that, whether one measures from the ASMFC's inception in 1942, from passage of the Atlantic Striped Bass Conservation Act[46] in 1984, or from passage of the Atlantic Coastal Fisheries Cooperative Management Act[47] in 1994, the ASMFC has never, even once, managed to rebuild an overfished stock and then maintain such stock at a sustainable level of abundance.

It did manage to rebuild the striped bass stock by 1995 but, despite multiple indications that such stock had begun to decline, allowed it to become overfished once again.

That record stands in stark contrast to that of the National Marine Fisheries Service which, thanks to the requirements of the Magnuson-Stevens Fishery Conservation and Management Act ("Magnuson-Stevens),[48] as amended by the Sustainable Fisheries Act of 1996 ("SFA")[49] and the Magnuson-Stevens

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[46] 16 U.S.C. 5151 *et seq.*
[47] 16 U.S.C. 5051 *et seq.*
[48] 16 U.S.C. 1801 *et seq.*
[49] PL 104-297

Fishery Conservation and Management Reauthorization Act of 2006 (the "2006 Reauthorization"),[50] has rebuilt 47 once-overfished stocks since 2000, while reducing the number of stocks that are subject overfishing to an all-time low.[51]

For the first 20 years after passage of Magnuson-Stevens, federal fisheries managers were no more successful at rebuilding and maintaining fish stocks than is the ASMFC; however, after the SFA and the 2006 Reauthorization imposed legally enforceable standards and thus a strict discipline on the federal fishery management process, NMFS' success rate soared.

Yet such success didn't happen all at once; even after passage of the SFA, federal fishery management plans often failed to prevent overfishing and/or failed to rebuild overfished stocks, due to miscalculation and the low (50 percent) minimum probability that such plans would succeed. Thus, the 2006 Reauthorization required that annual catch limits, set at a level no higher than that recommended by the relevant regional fishery management council's scientific and statistical committee,[52] be established for each managed species, and that fishermen be held accountable when such limits were exceeded.[53]

Requiring fishermen to be held accountable led to more conservative management measures, and more effective federal fishery management. If anglers were held accountable at the ASMFC, the Management Board would not be permitted to tolerate situations such as the one previously described, which existed between 2015 and 2019, when Maryland anglers not only failed to reduce fishing mortality by 20.5 percent, but were allowed harvest levels which, in some years were well over twice the levels contemplated in Addendum IV.

If anglers face no consequences for exceeding the target fishing mortality level, the Management Board has less incentive to adopt management measures likely to constrain fishing mortality to target; that is particularly true of those Management Board members who receive economic or other benefits from the recreational fishing industry. The resultant failure to adequately constrain recreational landings has a negative impact on the striped bass stock, the commercial fishery, and individual recreational fishermen who wish to enjoy higher levels of striped bass abundance.

In order to impose badly needed discipline on both the recreational fishery and the Management Board, an annual recreational harvest limit, and accompanying accountability measures, should be adopted in Amendment 7.

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[50] PI 109-479

[51] National Marine Fisheries Service, Status of Stocks 2019, Annual Report to Congress on the Status of U.S. Fisheries, July 2020, pp. 2-3, available at https://media.fisheries.noaa.gov/dam-migration/2019_status_of_stocks_rtc_final_7-15-20.pdf

[52] 16 U.S.C. 1852(h)(6)

[53] 16 U.S.C. 1853(a)(15)

2

In order to better account for annual variations in recreational landings, a recreational harvest target should be adopted in addition to an annual recreational harvest limit.

Regulating recreational fisheries always involves some degree of management uncertainty, which inevitably causes the point estimate of annual recreational landings to vary, even when fishing effort and fish availability remain relatively stable. In order to prevent such annual variability from requiring annual changes in recreational striped bass management measures, an annual recreational harvest target, which takes known sources of management uncertainty into account, is needed.

At a minimum, such recreational harvest target should consider the uncertainty inherent in recreational harvest estimates. As mentioned earlier, the percent standard error in coastwide striped bass landings for 2017 was 8.6. So to avoid management uncertainty from either permitting overfishing (if the point estimate understated landings) or unnecessarily requiring the Management Board to adopt new management measures (if the point estimate overstated landings), the management target would be set far enough below the recreational harvest limit to account for such uncertainty, and management measures calculated to constrain fishing mortality to such target. Management measures would then only need to be changed should the point estimate rise above the higher recreational harvest limit, suggesting that there is a real increase in the fishing mortality rate.

A larger buffer between the recreational harvest limit and recreational harvest target could be employed if the Management Board chooses not to relax regulations in response to a strong year class and the resulting temporary increase in spawning stock biomass, in order to maintain management stability. In such situation, the recreational harvest limit would increase in response to the increased biomass, but the recreational harvest target, and the management measures, would remain unchanged, making it more likely that even with the increased fishing effort that flows from increased abundance, the recreational harvest limit would not be exceeded, allowing the Management Board to maintain the management stability that it seems to prefer without doing harm to the stock.

3

Recreational accountability should be applied on a coastwide basis, except in the case of states that opt for conservation equivalent regulations, in which case accountability should be imposed on a state-specific basis.

After the Management Board adopts a coastwide set of management measures, states should be held collectively responsible for constraining fishing mortality to or below the target level. In the event that the coastwide recreational harvest limit is exceeded, the Management Board would be expected to adopt new management measures that could successfully keep fishing mortality at or below such target.

An exception to that rule would be made for states that choose to adopt conservation equivalent measures. Because such measures, if they prove inadequate to constrain fishing mortality, would have a negative impact on the coastwide striped bass management program, states which opt for conservation equivalency should have those measures evaluated on a state-specific level, even if the coastwide measures adequately constrain recreational fishing mortality.

It is entirely possible that coastwide striped bass fishing mortality will be held at or below the fishing mortality target, but that a particular state's conservation equivalency measures will fail to constrain that state's landings to the same level that would have been achieved if the state had adopted coastwide measures. In such situation, the affected state's anglers should still be held accountable for the overage, even though the coastwide goal was achieved. The opposite would also be true; even if coastwide measures need to be revised in order to adequately constrain fishing mortality, if a state's conservation-equivalent measures already achieved the needed reduction, no new measures should be required.

Such an approach would remove the temptation for states to adopt supposedly conservation equivalent measures that it knew, or at least suspected, were inadequate to achieve the needed reduction, particularly in a scenario where not only new regulations, but also pound-for-pound paybacks, would be the price of failure.

Answers to questions related to recreational accountability, as listed on p. 20 of the PID.

Should the Board consider implementing an RHL for recreational striped bass management?

Yes. Implementing such an RHL is one of the single most important actions that the Board could take to improve the striped bass management process. Such a limit, and the corresponding imposition of accountability measures, would impose discipline on the management process, make it less likely that the Management Board would approve conservation equivalent measures that undermine coastwide management measures, and would make states less likely to embrace conservation equivalent measures that are of dubious efficacy.

An RHL and associated accountability measures would also create greater equity between the commercial and recreational sectors, as the former sector is currently held strictly accountable for its overharvest, while the latter may not exceed its target fishing mortality rate with absolute impunity.

How should an RHL overage or underage be addressed?

An RHL underage need not be addressed at all, for in such case, the RHL successfully constrained fishing mortality to a level at *or below* the target level. An RHL should never be seen as a target that must be attained, but rather as a ceiling that should never be exceeded.

How an RHL overage ought to be addressed should be determined by the health of the stock. An overage that occurs when the stock is generally healthy should be addressed by modifying the management measures in order to return fishing mortality to the target level. However, if the stock is overfished or if it is subject to a rebuilding plan, an overage should require both a modification of the

management measures and a pound-for-pound (or fish-for-fish) payback of the full overage in the following year.

Overages should be addressed on a coastwide level for all states that adopted coastwide management measures, and on a state-by-state level for all states that opt for conservation equivalency.

Should stock status be considered when handling an RHL overage or underage?

Yes. As noted in the response to the previous question, paybacks should be required, in addition to modified management measures, when the stock is either overfished or subject to a rebuilding plan.

Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?

No. The establishment of a recreational harvest limit and recreational harvest target, accompanied by accountability measures that incorporate both mandatory modification of management measures and, depending upon the state of the stock, pound-for pound or fish-for-fish paybacks, would be sufficient to address the recreational accountability issue.

H

ISSUE 9

COASTAL COMMERCIAL QUOTA ALLOCATION

Should this Amendment address commercial allocation or be considered in a future management action?

No opinion. The critical issue facing the Management Board is the need to fully rebuild the striped bass spawning stock. Allocation, standing alone, is not relevant to the rebuilding issue.

Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation?

It is as appropriate a baseline as any, although it is not without problems.

Commercial landings were not fully reported during that period; it is possible that commercial landings for some or all jurisdictions were understated. In addition, during the period, the distinction between commercial and recreational fisheries was not clearly defined; many ostensibly recreational fishermen, who held full-time jobs and did not rely on fishing-related income, sold their catch as a matter of course, and in most if not all states, no license was required. The period saw some of the highest commercial landings on record, which resulted in overfishing; it also saw the beginnings of a stock collapse that caused such landings to sharply decline.

1972-1979 does not reflect conditions that exist today, or are expected to exist in the future.

On the other hand, no other possible baselines would provide better guidance. Commercial landings prior to 1972 are probably also incompletely reported, and were influenced by the inclusion of what

were then considered "recreationally" caught fish. Commercial landings from the 1990s and later years were influenced by quotas based on the 1972-1979 baseline.

Thus, unless the Management Board chooses to adopt a new allocation scheme that is based on current conditions in the fishery, and not on historical precedent (e.g., it takes away all commercial quota for so-called "gamefish states" such as New Jersey, which have no commercial fishery), no series of years would provide better guidance than 1972-1979, despite the problems inherent in that time series.

Should other allocation approaches be considered?

Yes. Use a hybrid approach that begins with the 1972-1979 baseline, modified to account for current fishing performance and the lack of commercial fisheries in some states.

Should the coastwide quota be explicitly set on an annual basis, or following an updated stock assessment of benchmark?

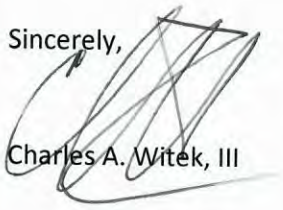
The coastwide quota should be set annually, based on the application of the target fishing mortality rate to the current spawning stock biomass. In years when no benchmark assessment or assessment update is available, quotas should be set based on spawning stock biomass projections in the most recent benchmark assessment or update thereto.

Should regions with the necessary data be able to use a harvest control rule where commercial quotas are set annually based on exploitable biomass?

No. Striped bass management impacts the entire coastal migratory stock; no state or region has exclusive control of the stock, and actions taken within the waters of a particular state or region impact every state between North Carolina and Maine. There is no peer-reviewed population model that would support region-specific management measures. Thus, the commercial quota must be set on a coastwide basis.

Thank you for considering my views on the above issues.

Sincerely,



Charles A. Witek, III

John Lefeber

125 Pleasant St

Brookline, MA 02446

3/19/2021

Dear Ms. Franke and ASMFC Atlantic Striped Bass Management Board,

My name is John Lefeber. I am an avid fisherman in the Commonwealth of Massachusetts. I am writing to express my views on the issues being addressed in Amendment 7 for Striped Bass Management. I firstly want to express my concern around the idea of changing the structure to Stiped Bass Management at a time when the stocks are at a 25-year low. At this time, our focus should be to rebuild the stocks to sustainable levels rather than wasting time with amendments. With that being said, see my below comments of the issues at hand.

Issue 1 - I believe that the current goal and objectives for the fishery are sufficient and recommend that this issue be removed from further consideration for inclusion in Amendment 7.

Issue 2 - I believe that 1995 is an appropriate reference year and recommend that the BRPs remain unchanged and that this issue be removed from further consideration in Amendment 7.

Issue 3 - The four management triggers related to spawning stock biomass and fishing mortality continue to be appropriate. I believe that it may be prudent to revisit Trigger 5, which attempts to address recruitment failure but whose specifications (if any juvenile abundance index is lower than 75% of all other values in the dataset for three consecutive years) may not be an appropriate indicator of such a failure given the stochastic nature of recruitment.

Issue 4 - I strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained, and that a rebuilding plan should be initiated for Atlantic striped bass as soon as possible.

Issue 5 - Given the combination of current Striped Bass status and the fact that the science is not available to inform stock-specific or regional management, I recommend removing this issue from further consideration in Amendment 7.

Issue 6 - I believe that Conservation Equivalency should only be considered if striped bass are neither overfished nor experiencing overfishing, given the greater inherent uncertainty that CE injects into the management process. States that do choose to implement CE must be held accountable should their regulations fail to meet stated conservation objectives.

Issue 7 - I believe that addressing this issue in Amendment 7 is rather premature given that the Massachusetts Division of Marine Fisheries is in the midst of a multi-year study to assess the impacts of various fishing methods and gear types on striped bass post-release mortality. That being said, at this point in time we recommend that efforts to reduce release mortality focus on outreach and education to anglers in order to promote best practices for safe release.

Issue 8 - The issue of recreational accountability is a complex challenge that applies not only to Striped Bass but to all recreational species under the jurisdiction of the ASMFC. I view this as a much larger endeavor that is not sensible to try to address within the confines of this amendment process. As a result, I recommend the removal of the issue of recreational accountability from further consideration in Amendment 7, *except as it pertains to accountability for states that implement CE* (see Issue 6).

Issue 9 - I recommend that the Striped Bass Board work with the Technical Committee to update commercial allocations in a manner that better reflects the characteristics of today's commercial Striped Bass fishery. Commercial allocations are way to high given the status of the current stocks.

Issue 10 - I recommend inclusion in Amendment 7 guidance for expanding human dimensions research in the striped bass fishery and provide a pathway by which such research could be applied to future management discussions. We also recommend that the Striped Bass Board support research to better understand the relative contributions of individual striped bass spawning stocks to the overall coastal population targeted by anglers, as such efforts could ultimately inform stock-specific management and ensure the long-term vitality of the striped bass population and fishery.

The Striped Bass is a uniquely American fish, which has been at the core of life in the nation since its founding. The first public schools in the country were funded by taxing the sale of Striped Bass. This is a natural resource which we need to conserve to the best of our ability. This is a responsibility we should not take lightly.

I am an avid recreational angler. I have been fishing for Striped Bass since I was five years of age, living in southern Connecticut. I have caught and released Striped Bass from Long Island Sound all the way to the Damariscotta River in Maine and everywhere in between. I fish both with a fly rod and a spin rod, designing my own flies and lures to target these amazing fish. Striped Bass fishing is a passion of mine that I expect to be able to pass down to my kids and others in the future. If the current rate of mortality continues, this will not be possible. Now is the time to start taking these concerns seriously. Please, take my comments on the issues. In my opinion, they will help restore the Striped Bass to its's former glory.

Thank you,



John Lefeber

American Saltwater Guides Association
Floral Park, New York.

March 18, 2021

To Whom It May Concern:

Thank you for the opportunity to comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass.

As an avid saltwater fly fisherman I can help but notice the present striper situation. I typically see schools of small fish that move through over the season. But, it still remains difficult to find fish bigger than 30 inches. I believe that we all need to focus and take action to support on the health of the mature striper population.

I support the recommendations of The American Saltwater Guides Association (ASGA) relative to their belief that the striped bass fishery has urgent needs. The stock was declared overfished nearly two years ago, and while the Atlantic Striped Bass Management Board took action to end overfishing through Addendum VI,[3] there has not yet been any discussion of a rebuilding plan, despite Amendment 6's own requirement that the stock be rebuilt within 10 years of being declared overfished.

Striped bass are the foundation of the recreational fishing community and economy along the east coast. Ensuring a healthy population is critical for ensuring that all stakeholders are able to thrive. I urge the Atlantic Striped Bass Management Board to put the resource first as it navigates the Amendment 7 process.

Thank you for your consideration of my comments.

Sincerely,



Peter T. Susca
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Wethersfield, CT 06109
860-713-8050
ptsusca@cox.net

March 11, 2021

Good day to you all,

I am writing today to opine on the proposed rule changes for commercial striped bass fishing. Specifically, the effort to allow for both expanded days and a lengthened commercial season. I hope to offer a respectful and thoughtful opinion. My purpose is not to directly take on ASMFC or its amendment 7 implications; that is best left to those most familiar. My objective is to express my concern from the vantage point of an average recreational angler.

In the interest of brevity, I will not attempt to fully expand each tenet of contention on proposed amendment 7. I Just think the underlying premise for its adoption would be amiss. I believe my view is widely held amongst recreational fishermen. While it is derived from personal observations, I believe the following opinion is , not mine alone, as I echo observations of other concerned fisherman. Being a witness to their passion and having respect for their input derived from aggregate combined hours upon hours and years upon years on the water further supports the validity.

Over the years I have tacitly followed regulations and, for the most part, they appear to be balanced and somewhat fairly metered out. I trust and take on faith that the regs are supported by the best science.

What spurred me to write was the fact that the current logic on the newest iteration of a proposed relaxed regulation appears to be fundamentally out of sync and balance with the situation on the ground. To be sure I realize that an allotment (quota) is granted by the ASMFC, and it is within the purview of DMF to devise a construct for commercial folks to "achieve" this quota. My impression, in the absence of evidence otherwise, is that DMF appears to only react to the reduced catch with enhanced commercial accommodation. In doing so, the impression left is: "If the quota is unmet, then it appears that the DMF will answer the call to just lower the bar." As a layman, I most certainly could be misguided, but the DMF approach appears off the mark. I contend that the problem is actually an out of date quota. A quota that is not sufficiently supported. I fundamentally believe it cannot be entirely accurate without explicitly incorporating the fact an obvious current reduced biomass drives this problem. That fact indeed appears to be the most likely culprit in the reduced harvest and not a signal or enhanced need to expand commercial access, as is proposed.

To metaphorically convey my read on the proposed rule change, I offer this: *A man takes a nasty fall and is rushed to the doctor. The doctor takes x-rays and tells the man he has a broken arm. The man states,* "*I can't afford the cost of this proposed re-setting of the broken bone." Doc says, "That's ok then; we'll just touch up the x-rays."*

This might be a comparative stretch, but relaxing the rules that govern the commercial harvest of striped bass might be akin to providing the worst and wrong fix for the right problem. While I agree the right solution is evasive, I believe the hierarchy of approach may be flawed by not comprehensively addressing the most critical underlying issue - depleted stocks.

My sincere belief is that the problem lies with the seemingly outdated and generous quota limits by today's modeled input. In other words, although reduced in 2020, the quota may still

be overly ambitious in light of an obviously depleted biomass. My question is this: if empirically the stocks are in trouble, wouldn't that imply the opposite fix to the proposed regulatory intervention? To not enhance the catch but continue to allow for species recovery? For two years the harvest has not yielded quota, but in the immediately preceding years quota was reached. Could it be that the fisherman's skills and techniques have diminished? I say no. That the fish are less plentiful? I say yes. All things being equal, there's the most likely reason for not filling the quota.

Will relaxed rules do other than advantage the commercial harvest while in the long term provide unintended consequences by allowing more opportunity to accelerate and diminish the breeding stocks? With all due respect, why is this not intuitive? Look no further than The Martha's Vineyard Derby, which has taken Striped Bass out of its competition. Others have done the same requiring catch and release or other non-regulatory born mitigators to help support the biomass. Also, of interest is that, according to the 2018 stock assessment issued by NOAA fisheries, Atlantic Striped Bass are overfished and continue to be subject to overfishing. In addition, consider data provided by proactively polling seasoned recreational licensed fisherman instead of waiting for reaction. Reaction is often tendered too late because we have other jobs. Are all these points not leading indicators and a barometer to recognizing a troubled fishery? If we are all being honest, at some level we all recognize a biomass problem exists. The question should continue to be… why? What is the highest and best use of regulator intervention?

The proposed reg relaxation appears to further exacerbate an existing flaw by the allowed commercial slot size. Why? Because this size is a slot class that is predominantly female. Fewer females mean less opportunity for breeding success in this pressured species of fish. I am hopeful DMF factors in the algorithms used that breeding females are not successful in every year due to varying water conditions surrounding their breeding grounds. This is the predominant reason for fluctuations in each year class. It is theorized this is the reason that nature generally provides striped bass such a long lifespan. In my view, females are the key to the future, and the fewer there are, the fewer reproductive strategies that are deployed by each.

I feel another large consideration should not be overlooked. Admittedly it is outside of the scope of addressing Amendment 7; however, there is a direct concern in support of the underlying reasoning to object to this proposed relaxed rule change. The money derived from the sale of breeders competes mightily with recreational economies, without which local economies dependent on a well-managed fishery directly suffer. Some of these considerations include motels, tackle and bait shops, boat dealers and others which, in whole or in part, provide a broader base. To varying degrees these economies support recreational fishing needs as they predictably suffer when management of future stocks is sub-optimal. No fish-No business. In many cases the recreational fisherman and local economies appear more often than not to get short shrift of the commercial lobbies creating an imbalance in consideration. In light of the above I cannot for the life of me understand why this particular proposed commercial rule relaxation constitutes optimal species management.

Thank you in advance for your consideration.

Sincerely Yours,

Edward P. Callahan
280 Old Main St.
S. Yarmouth Ma. 02664

Patrick H. Cassidy
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March 22, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
comments@asmfc.org

Re: Public comment on the Public Information Document for Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Dear commissioners and commission staff,

Thank you for accepting my comments on the striped bass PID. I hope mine are among many the commission considers carefully during this process.

In light of the latest stock assessment and a failure to successfully manage Atlantic striped bass over the past quarter century, there is once again much work to be done toward the commission's stated goal of "commercial and recreational fisheries consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock..." Many suggestions within the PID - which sets the trajectory for Amendment 7, whatever the ostensible purpose - run fundamentally counter to that goal and related objectives. At a time when the population of stripers is at a low not seen in recent memory, radical changes to the regulatory regime that are anything but conservative should be rejected. Now is the time to focus on the "protection of such fisheries," as described in your mission statement. Put simply, protection of the fisheries starts with protection of the fish.

I am a Massachusetts resident and, as a working fishing guide, operate one of many businesses up and down the "striper coast" which rely directly on this fish and its future for my livelihood. In this my interest is selfish but it is also part of a mosaic of economic, cultural and social value that should be embedded in this discussion. I spend the revenue I generate on gas, equipment (made domestically whenever possible), taxes, fees and the many other costs required to successfully run a small business. My clients spend their money traveling to Cape Cod, eating at local restaurants, and on lodging or other activities while visiting the region. At the heart of all of that activity is one thing: fish in the water. Beyond the simple financial benefit my business and others derive from a healthy striped bass population, my life, family and the stories I share on and off the water are intrinsically tied to these fish.

In direct response to your public comment questions and the enumerated issues, I present the following for your consideration in reverse order:

Issue 10: Changes to the climate and related effects are well underway. Anyone who has spent time on the water knows this is true. This topic, along with the effects of ongoing habitat degradation from improper wastewater management, pollution from runoff, fossil fuel spills and the increased amount of plastic in the marine environment where striped bass swim, should be a significant priority in everything ASMFC does. Limited law enforcement resources clearly hinder the ability to act on violations stemming from the regulatory decisions made by this body. Because of this, Massachusetts in particular struggles to control poaching, high grading and other criminal activity at chokepoints like the Cape Cod Canal. The commission should address this with whatever resources or influence it can bring to bear in its member

states and with federal enforcement authorities. In addition, the commission should continue research on spawning stocks and the potential for stock-specific management. More on this as it relates to Regional Management is covered in Issue 5.

Issue 9: Based on recent harvest data, the commercial fishery cannot be independently blamed for the current state of striped bass stock, albeit a source of historical effect. And, barring the establishment of a game fish only status or the extraordinary step of a moratorium proposed by others, singling out the commercial fishery is not sound policy when recreational harvest currently dwarfs its commercial counterpart. That being said, there is no way to directly compare the two sectors. Because of current regulations and the sporadic aggregation of effort in particular areas (e.g. off the coast of Nauset Beach circa 2012), the commercial sector can, for example, foster the removal of large fish - the breeders - from specific areas. There are additional concerns about the basis for commercial allocations, efforts to expand the commercial season and locations where it appears quotas are not being met not due to lack of effort but due to a scarcity of target fish. It's unclear why the current commercial fishery allocations are still fundamentally based on landings data from 1972-79. Commercial landings during that time period were significantly higher than at any other time on record (Richard & Duel, 1987). Although commercial landings have been reduced through regulation since the first use of that timeframe in 1989, establishing a baseline at a time when effort and landings were clearly extraordinary stacks the deck in favor of attempts to recapture such glory days, an unlikely outcome given the many hurdles facing the fishery. While this seemingly arbitrary choice of a baseline might align with similarly arbitrary (though disparate) proposed actions related to spawning stock biomass, the precise ability to track declines in commercial landings lends itself toward updating allocations with new data that would also reflect changes in effort on the recreational side of the ledger, broader ecosystem changes and shifts in demand, among other factors.

Issues 8 & 7: These issues hit home as I live and work in the for-hire and recreational fishery. I am a strong proponent of better data in, better decision making out. Improvements to MRIP are a step in the right direction but it seems there could be a better way to quantify the effects of the recreational fishery on the spawning stock biomass. Concerns about catch and release mortality are warranted but are best addressed through education and outreach. (I spend a lot of time explaining to my clients how fish should be properly handled and pointing out, unfortunately, the many cases on the water where we see fish being mishandled.) It appears there is often confusion about the difference between improving the 9 percent estimate for catch and release mortality - i.e. through better science as is currently being undertaken in Massachusetts - and improving the actual number of fish who survive after being caught and released. Both should be improved but, as you know, they are two different things. Addressing catch-and-release mortality should include more study of closures due to environmental conditions, such as high water temperatures.

More generally, improvements in recreational accountability are clearly necessary but part of a far broader issue than is reasonable to address in this amendment, except where it directly relates to existing problems with current management schemes such as the use of conservation equivalency, which is addressed in Issue 6.

Issue 6: Conservation equivalency on its face is counter to a coastwide management plan. What is referred to as "an essential tension" is anything but essential; it is manufactured by the existing regime that allows states to opt out of a rigorously developed and studied plan for what amounts to a far less deliberative approach that effectively carves state-size holes fish swim through on their coastal migration. These holes also affect the success of the states on either side of a state that uses conservation equivalency in meeting goals and the broader objectives of the coastwide plan. The use of conservation

equivalency is a political construct and, if used at all, should only be allowed when striped bass are neither overfished or subject to overfishing. Per the earlier discussion of Issue 8, when conservation equivalency is used there is an absolute need for improved accountability for states that fail to meet the original, coastwide conservation objectives.

Issue 5: Similar to Issue 6, the idea of regional management sounds good until it butts up against the reality of separating fish as they cross state boundaries, or separate stocks that mix once they reach the ocean. The work to develop stock-specific or regional management currently lacks the science necessary for implementation. Given this and the existing status of striped bass, this issue should be removed from consideration as part of Amendment 7.

Issue 4: Rebuild the stock and do it quickly. It's unclear why a longer timeline for rebuilding the stock would be good for anyone. To do so, a rebuilding plan is necessary and time is of the essence, especially in light of the baked-in uncertainty from a year lacking more precise data from MRIP.

Issue 3: Barring additional information, management triggers should be maintained as they are, with the possible exception of trigger 5 regarding juvenile recruitment. As has already been referenced and as I will discuss in relation to Issue 2, language within the PID steers the discussion in another direction and raises significant concerns with statements such as: "The latest science also indicates that the SSB target has never been reached which raises questions that it may be an unreasonably high management target given current objects [sic] for fishery performance and changing or altered ecosystem conditions (e.g., climate change, and changes in other predator and prey population abundance)." More to come on Issue 2 but the purpose of this language and any resulting changes is clear, i.e. our management has failed to achieve the existing targets or thresholds so let's lower them. This is not science-based unless there is an analysis I'm unaware of that accounts fully for the effects of the examples given. Changing triggers based on incomplete information is not reasonable, especially in light of prior successes in meeting goals to rebuild the striped bass population. We should all try to do better, not move the goalposts so as to simply create the appearance of doing better.

Issue 2: Per the discussion on Issue 3, any move to change biological reference points should be based on science and data, rather than a failure to achieve the related targets or thresholds. During the annual meeting where the PID was approved, the last minute (not hyperbole) inclusion of the following statement was clearly another attempt to steer the discussion in a particular direction: "Given the 2018 benchmark assessment found overfishing was occurring and the SSB was below the target even during those years that the striped bass population was at a historically high level, the current reference points may be unattainable given current objectives for fishery performance." The brief discussion that followed a staff member referencing this language as included at the request of a board member and having no substantive effect was mind bending. The argument that board members didn't like other things in the document and didn't want to reopen the whole thing at such a late hour, reminded me of a passage Joseph Heller might have written in *Catch-22*. By including this language, the exact thing the aforementioned board member argued he didn't want to do was done. The new language should never have been added and any concerns with other aspects of the PID were presumably vetted and debated during the extensive discussions that led to its drafting. Those discussions were also the place for additions such as the one referenced here, not moments before the final version was approved.

More specifically, there is nothing that indicates changing the 1995 estimate of female spawning stock biomass to another year would be based on anything but the previously referenced attempt to move the goalposts. That year was chosen for specific reasons at the time, i.e. the stock was officially determined to be recovered, and it represented a recovery across a range of year classes that aligns well with

biological spawning strategies. Choosing another year that fails to represent those same objectives is arbitrary in relation to the stock's health, even as it is targeted to allow the harvest of more fish. To make this change in a vacuum of corresponding logic is unscientific, arbitrary and capricious, unless the entire goal is to kill as many fish as possible. If that's your goal, you're on the right track.

Issue 1: In that vein, the commission's current goals and objectives are appropriate. If the commission is considering changes to these goals to return to the days of optimum yield, some of the language previously discussed is a transparent reflection of that effort. In particular, the discussion about possible changes to biological reference points flies in the face of the goals of allowing "commercial and recreational fisheries consistent with the long-term maintenance of a board age structure, a self-sustaining stock." Leave the goals and objectives as they are and strive to achieve them. If anything, a shift in the opposite direction is underway beneath your feet and supported by many stakeholders, as evidenced in the comments submitted at the Massachusetts hearing on the PID. The takeaway from those comments is that your goal should shift from maximum sustainable yield to managing for abundance. I concur.

Thank you for considering my comments and those of the thousands of striped bass anglers who care deeply for this resource and its future. Our hope is that the PID and Amendment 7 reflect similar care and lead to a healthier population of the fish and fisheries you are entrusted to protect.

Sincerely,



Patrick Cassidy

cc: Mike Armstrong, Massachusetts Division of Marine Fisheries
Raymond Kane, Cape Cod Commercial Fishermen's Alliance
Dan McKiernan, Massachusetts Division of Marine Fisheries
Massachusetts Rep. Sarah Peake
Sherry White, U.S. Fish & Wildlife Service
Patrick Paquette, Massachusetts Striped Bass Association
Douglas Amorello

Citation: Richard, R. Anne & Duel, David G. (1987) Atlantic Striped Bass: Stock Status and the Recreational Fishery. *Marine Fisheries Review* 49(2), 59.
https://spo.nmfs.noaa.gov/sites/default/files/pdf-content/MFR/mfr492/mfr4927.pdf

Comments on Striped Bass Management Plan Amendment 7 PID

March 15, 2021

Peter Hallemeier
12 The Glade
Simsbury, CT 06070

Hello,
I am a recreational fisherman who has been fishing for striped bass in MA and CT for over 40 years, primarily from a boat. Below are my comments on the questions posed in the PID based on my involvement with the fishery. I hope you find them useful.
Sincerely,
P.H.

Issue 1
Public Comment Questions: Are the existing goal and objectives of Amendment 6 still in line with current fishery needs and priorities?

PH>>Yes, I believe the biomass and age distribution targeting are the correct goals.

Which specific priorities (if any) are missing from the existing goal or objectives?

PH>> A goal of providing for enforcement of the management plan should be added. Unfortunately, there are many documented cases of violating regulations, and frankly, there is no perceived consequence for violating the rules.

Which of the existing objectives (if any) should be removed or refined?

PH>>I think that providing local flexibility undermines the goals of a uniform management plan. It seems inconsistent to me that a migrating species, covering a large geographical area, can be managed by varying local rules. In addition, it makes it more difficult to put out a unified message to the fishing community.

Do the existing objectives balance the need for management stability, flexibility, and regulatory consistency?

PH>> I do think the objectives balance the needs. However the details of the implementation often wander from the stated objectives. For instance, having different size and bad limits for the commercial fishery. I have nothing against the commercial fishing, but I don't see how allowing the taking of larger fish leads to stability and consistency.

Which of these three themes do you value most?

PH>> Consistency.

Issue 2

Is the 1995 estimate of female SSB still an appropriate benchmark for determining stock status?
PH>> No. Clearly our knowledge has improved dramatically.

Is there a better empirical reference year or other empirical approach that should be considered?
PH>> The goal should be to strive to improve the overall average biomass over time. I would suggest using a long term average of the peaks, minus some factor say 25%. That way the stock is managed to within its potential at any given time, with the goal of improving the potential.

Is a 25% buffer appropriate for the SSB target?
PH>>please see above.

Should the Board prioritize development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components?

PH>> I support developing better models as this will help getting better knowledge about the fishery. However, managing to local goals clearly has not worked in the past. The goal should be to manage the stock as a whole. In my opinion, this is a Trojan horse for undermining the management of the overall population.

What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?

PH>> The goal should be to maintain a large population of breeding size fish that are sacrosanct, with regulations only allowing the taking of less mature fish. In my opinion, the inability to manage to this basic principle is the root cause of the SSB fluctuations. When recruitment is bad, and the breeding stock is not above threshold during the years of poor recruitment, the SSB varies tremendously.

Issues 3&4

Which management triggers (if any) should be revisited?
PH>> I believe the management triggers are generally very good. However, due to the variability (and method of measurement) of juvenile recruitment, I would reduce the influence of this parameter, relative to the SSB. As stated earlier, I believe biasing the management triggers to maintain a higher SSB would help get through the lean recruitment years.

What is an appropriate timeframe to respond to overfishing or overfished determinations?
PH> A two to three year timeframe seems about right to me.

Should the fishing mortality-based triggers account for annual variability in fishing mortality?
PH> Yes. This should be used as a short term metric to maintain SSB.

What is more important, rebuilding the stock quickly, or mitigating impacts to fisheries?
PH> Mitigating impacts. The fishing pressure is so intense these days that large impacts can be made in short time frames.

In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?
PH> I see it a little differently. If we could get to a high SSB, with a heavy population of large breeding fish, then using mortality metrics to manage the short term harvest would be ideal.

Issue 5

Should separate regional management programs be pursued for the Chesapeake Bay and the ocean region, which includes the Delaware Bay/Hudson River stock complex? If so, how should the Board determine the appropriate allocation of fishing mortality between the two regions?

PH>> As mentioned earlier, I am concerned about managing the stocks independently. It is possible that the separate populations are a consequence of historic overfishing. From everything I've read, the species is highly adaptable to geographic opportunity, in other words if there's food and good environment they will change locations. Given the establishment of local populations in many rivers up and down the coast in recent history, its hard to believe that the population did not intermix up and down the coast over history. Additionally, I also fish offshore for pelagic species and over the last 20 years, I have witnessed many more striped bass in the EEZ, presumably migrating. This is probably also an environmental response (bait, water temp, etc.) but I believe it shows there may be more intermixing of stocks than is currently accepted.

PH>>I am concerned that managing the populations in specific areas actually leads to lower SSB over time as the species creates less genetically adapted strains. However, I do believe that management program should address the mortality rates on a local basis. If the mortality could be determined to sufficient accuracy for a given geographic fishing pressure, the regulations should be adjusted as such. For instance, the high post spawn fishing pressure in the Chesapeake should have stricter management due to the higher mortality.

Should the Board consider any other areas (e.g. Delaware River or Hudson River) for separate regional management programs? If so, what level of data should support additional regional separation? Should development of similar assessment tools be prioritized to support regional management programs for other areas of the coast?
PH>> see above.

Issue 6

Should CE be part of the Striped Bass FMP? Should the Board restrict the use of CE based on stock status, data restrictions, differences from neighboring state, and/or any other potential issues? Should the Board provide a strict definition for 'equivalency' (e.g., equal to the level of harvest the fishery would have achieved under the standard measure)? Should more quantitatively rigorous and clearly defined data requirements be required as a pre-requisite for CE proposals to be considered? Should there be limitations to how many CE proposals a state can submit? Should CE be limited to time and areas with unique ecological characteristics (e.g., presence of smaller striped bass)? Given state-level MRIP estimates are often less precise than regional or coast wide estimates, are these data used appropriately to develop CE proposals? Given the variability in recreational catch and harvest from year-to-year, how do you evaluate effectiveness of CE programs following implementation?
PH>> There should be no CE. History has taught us that the individual states too easily respond to local constituencies and the resource suffers. There should be one plan for the whole coast, and if needed, with different mortality targets for certain areas.

Issue 7

Should management focus on reducing the rate at which fish die after being released alive through additional gear restrictions similar to recent actions regarding the use of circle hooks (e.g., banning gaffing or the use of treble hooks)?
PH>> Yes. This is a big issue. I believe a couple of factors should be considered: 1) The popular trend of using very light tackle leads to overtiring the fish before release, 2) The popularity of using "soft plastic" baits, which are very similar to real bait, have increased mortality and should require circle hooks and maybe even be required to be biodegradable (everyone has seen the pictures of dead striped bass trying to pass a plastic bait through their anus). How to address these is not clear to me, but I believe these trends are significant contributors.

Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released?
PH>> Unfortunately, if the mortality can't be reduced, yes. Hopefully this can be used to motivate fishermen to be better stewards of the resource and incite them to go learn how to prevent mortality (proper gear, proper release, etc.)

Should management consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released?
PH>> Yes. Since the mortality is strongly dependent on water temperature, I believe reducing fishing activity once the water is over say 75 deg would help a lot, say in shallow waters or bays.

What are some ways to improve awareness and stewardship of the resource?
PH>> Make it clear to the fishing community that bad stewardship results in less access to the resource (as mentioned above).

Issue 8

Should the Board consider implementing an RHL for recreational striped bass management?
PH>> Yes.

How should an RHL overage or underage be addressed?
PH>> Adjust the following year.

Should stock status be considered when handling an RHL overage or underage?
PH>> Yes. It should be based on maintaining a strong SSB.

Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?
PH>> Yes. Charter Captains (recreational) should be required to report landings. This data would be invaluable as they typically spend the most time on the water in a given area and tend to be the most productive fishermen.

Issue 9

Should this Amendment address commercial allocation or be considered in a future management action?
PH>>Address now. How can we have a comprehensive plan without considering all of the major components?

Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation? Should other allocation approaches be considered?
PH>> No. It makes no sense to use historical data that is poorly understood. A metric based on stock assessments, say a percentage of SSB, would be more appropriate.

Should the coast wide quota be explicitly set on an annual basis, or following an updated stock assessment or benchmark? Should regions with the necessary data be able to use a

harvest control rule where commercial quotas are set annually based on exploitable biomass?
PH>> yes, see above.

Issue 10

"How would you like management of the Atlantic striped bass fishery to look in the future?"

PH>> As mentioned a number of times, I would like to see a coast wide (non-state based) management plan that focuses on keeping the SSB high, with a high percentage of large breeding fish to keep recruitment potential high. This would include limiting the max size for the commercial and recreational fisheries, using a slot limit system for both. Lastly, I would like to see a multispecies approach that considers prey species stock levels (menhaden, herring, squid) when making management decisions. This component seems to be overlooked, but as every fisherman knows, determines where, when, why and how the fish will thrive.

Thank you.

Emilie Franke, FMP Coordinator
1050 N. Highland St. Suite 200A-N
Arlington, VA 22201

Emilie:

The following is a summation of comments I have received as a Striped Bass Advisory Panel member, from the public through various channels including public hearings, e-mail, social media and direct conversation. They do not necessarily represent my personal opinion though that is not to say I disagree with any.

Issue 1: Fishery Goals and Objectives
There was not a lot of comment here but the general sentiment was that the Board should maintain current goals and objectives while also using new information to evaluate if they are, in fact, still an accurate reflection of fishery needs and priorities.

Issue 2: Biological Reference Points
There was overwhelming support for maintaining the 1995 estimate of female SSB as the SSB threshold. In fact, noone spoke in opposition to this. Those who remember fishing at this time long for a return to the good old days and expressed that a change to anything less, especially without supporting data, would only result in a less than desirable outcome.

Issue 3: Management Triggers and Issue 4: Stock Rebuilding
There were fewer comments here but the general sentiment was to remain with the status quo as it represents the best available science and stability. However, there were several comments related to also having sufficient flexibility to react expediently with management action when SSB is below target level.

Issue 5: Regional Management
As with Issue 2, comments were unanimous, and against a regional management approach. A common point expressed was that striped bass are a migratory species so what one state does affects all others in the fishery. Some also expressed that Maine sometimes seems unfairly penalized given the relatively minimal impact we have on the resource, especially in light of the amount of coastline. Maine has consistently been a leader in pro-active conservation management strategies yet receives little recognition or benefit.

Issue 6: Management Program Equivalency
Here again, comments were unanimously opposed to conservation equivalencies as many felt they were simply loopholes offering states a way to cheat the system. This despite the fact Maine could actually benefit from creative management strategies.

Issue 7: Recreational Release Mortality
Several commenters questioned the methods used to measure this but most acknowledged it is a significant issue that could best be addressed through more and better public education from state agencies on proper handling methods.
Issue 8: Recreational Accountability

Comments here were along the same lines as those for Issue 7, with a general consensus that we should maintain the current size, bag limit and season system as opposed to a hard or fixed quota.

Issue 9: Coastal Commercial Quota Allocation
Comments here were mixed. The majority of those providing comment on social media favor a reduction or elimination of commercial harvest, and even a fishery-wide declaration of striped bass as a game fish. Public hearing comments were directed more toward the veracity of using 1972-1979 landings as a baseline.

Issue 10: Other Issues
Given the vague and open nature of this "issue" it was not surprising there were few comments. Most were related to seeking accurate ways to evaluate the impacts of climate change, weather events and changes in forage distribution on both the stock and mortality rates.

Respectfully submitted,
Bob Humphrey
NOAA Fisheries HMS Advisory Panel
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April 7, 2021

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am a passionate and concerned recreational angler who pursues striped bass religiously. I am based out of New York City and primarily fish in New York 4-5 times a week between April to December to target striped bass. However, I also make frequent trips to New Jersey, Connecticut, Massachusetts, New Hampshire and Maine throughout the year. To say I care deeply about this fish is an understatement. Next to family and friends, striped bass play such an important role in my own life to the point where I would even say "I LOVE STRIPED BASS."

I said "concerned" earlier because I have seen the stock of striped bass in severe decline across a wide range of important population metrics for several years in a row. Now they are overfished. Again. And still experiencing overfishing. Your own data and figures show these very trends. My own angling experiences echo the same; there are clearly fewer fish in general and an absence of larger fish with mostly smaller undersized "schoolies" making up the majority of my catch. I seriously worry for the future of striped bass…

For Issue 2, I believe that 1995 remains an accurate reference year, and recommend that the Biological Reference Points remain unchanged until the stock is robust. It does not seem appropriate to change important metrics of population health when the stock is in such poor shape now. Once striped bass are not overfished or experiencing overfishing, this could be revisited but to do so at a time when the population is at a 25-year low is unacceptable.

For Issue 4, I also strongly believe that the 10-year rebuilding timeline currently specified in Amendment 6 should be maintained. It is deplorable to increase harvest of any kind during the recovery of this sensitive stock and while striped bass may not be overfished or experiencing overfishing. Your agency should strive to maintain long term population stability, not just crash-rebuild-repeat. The moratorium in the 80's showed 10 years of minimal harvest was successful in rebuilding the striped bass stock.

For Issue 5, Regional management should be removed from further consideration in Amendment 7. There is not detailed enough data to provide any state agency with a robust understanding of striped bass populations in their waters to create acceptable regulations. Often short sighted,

opinion-based policies are put in place by regional management that can harm this entire stock to benefit a small fraction of its total anglers. This is unacceptable and frustrating to see be allowed.

For Issue 6, I do not support conservation equivalency in any form for striped bass. This is a highly migratory coastal species that is shared among many states throughout the fish's life history. I do not think anything below the current 1 fish between 28-35" slot limit is "equivalent" in any way. How are some anglers allowed to keep 18" striped bass, a fish that has likely never spawned or never will get to? That is far from equivalent and an obvious source of unnecessary mortality in this fishery. To recover the striped bass population, mortality must be reduced and can be accomplished by removing conservation equivalency regulations that unnecessarily harm this already overfished stock.

As a catch and release angler, I do not keep striped bass. Everyone is released because of the dire state this fishery is in. I use lures and minimize harm by removing treble hooks where I can, I do not use bait, and I keep the fish out of water as briefly as possible. It is my intent to release every fish in good condition. I work very hard to reduce any source of potential mortality I can.

No commercial fisherman is paying a mortgage or college tuition off of striped bass. No recreational fisherman is substantially feeding there family every week off of striped bass. No bait and tackle shops are catered only to the sale of striped bass gear and pay staff from striped bass tackle sales exclusively. My point here is while these groups are all stakeholders in this resource, they are not dependent on harvesting striped bass to the point of harming this fishery in order for them and their families to survive. Please consider the infinite value of striped bass as a gamefish, not a meat fish like porgy or black sea bass or dogfish.

Many other states with other highly sought-after gamefish like striped bass have used progressive management to preserve the quality of these sport fisheries and protect the species simultaneously. The tarpon and snook fisheries of Florida are heavily restricted, yet continue to produce trophy level catches regularly for recreational anglers despite angling and release mortality. The red drum off of the Carolina's are another great example. It would be incredible to see a similar advanced fisheries management framework be applied to striped bass, not just have stripers be regulated for harvest when their mortality benefits so few in its current state.

Thank you for the opportunity to share my comments. I sat in on a recent online meeting and was very discouraged with ASMFC stance towards industry industry industry and seemingly favor the perspective of business so heavily over your own science. I hope my comments and those of other anglers will help inform your agency on how a large majority of anglers feel about the mighty striped bass and this very special fishery we are lucky to have.

Thank you for your time,



Eric Malone

Dean L. Clark 596 Franklin St., Duxbury, MA 02336

The following is in response to the request for public comments regarding Draft Amendment 7 PID

Background: Twenty or so years ago the ASMFC proudly took credit for and boasted about what they claimed was the 20th century's greatest example of responsible fisheries management: the "recovery" of the western Atlantic, migratory, wild striped bass. Prior to the "recovery" the species had been severely depleted by regulated overharvesting. Consequently, a moratorium of sorts was imposed to bring back the fishery. The bold move succeeded in a dramatic increase in stock abundance and age class distribution, and especially the SSB, to a point where the ASMFC proudly took credit for the "recovery"!

It is time once again for the ASMFC to take another bold initiative and make the long-term welfare of the species a planning priority over what has for too long been short-term, species destroying, MSY harvesting goals.

The defining economic value of the striped bass fishery has evolved over the past 75 years (from the end of WWII). Once only measured by commercial MSY, or dollars per pound at market, the value of the striped bass fishery has since become redefined by its many hundred times greater economic value as a recreational fishery*, a user group made up of millions of individuals.* ***The increased value of striped bass today as a recreational species over its limited value as a commercial species is well documented by NOAA data and other independent studies.***

Maximizing the value of a fishery is an admirable goal. The ASMFC has been trying to do this forever. Unfortunately, due to pressure from harvesting (commercial) interests, this commendable effort has resulted in the degradation of many fisheries. Maximizing the return value from a fishery must be accomplished with an awareness of the truth and not be blinded by politics or driven by harvesting pressure. ***The real economic value of striped bass both now and going forward lies in its worth as a recreational species and no longer as a commercial target.*** The ASMFC must accept this and reprioritize their management goals to reflect this publicly accepted fact.

When managed for commercial purposes the priority is MSY. The reverse is true when a species is managed for its recreational value. ***As a recreational, economic asset, a species is managed for maximum abundance – alive in the ocean, not harvested and dead at market. <u>The management goals – commercial vs. recreational - are polar opposite - exploitation vs. conservation - and they cannot, as proven by history, be successfully achieved at the same time</u>.***

The on-going roller-coaster ride between abundance and scarcity is a poor management model. A return to a moratorium for an unspecified amount of time would a) give the ASMFC a regulatory "tool" that would allow for a structured redefining of "value" from commercial over to recreational while b) give the striped bass an opportunity to recover just as they did the last time a moratorium was mandated.

Yes, this is a bold and decisive step to take but one that is consistent with documented fact and need:

1. Stripers are and have been trending downwards for nearly 20 years.
2. A moratorium puts all user sectors on equal footing.
3. A moratorium has a proven track record of success (see earlier comments about ASMFC pride in the previous recovery)
4. It gives the ASMFC time to redefine the "value" of striped bass, both internally and externally.
5. Managing a species for the recreational market demands regulating for species abundance thus the welfare of the fishery takes management precedence over MSY, so the species will flourish.
6. Millions more individuals do and will receive recreational value from the species compared to the very few that currently benefit commercially.
7. A recovered fishery will result in additional growth of the currently depressed recreational striped bass fishing economy.
8. The fishery will be far easier to manage by prioritizing the welfare of the fish over the now conflicting goals of having to manage for both MSY and increased abundance… an impossible task to achieve.

I am certain that most folks will respond to your request for input by commenting on each of your defined proposals and subjects. Most of these comments will reflect the conservation interests coming from the recreational sector…. as they should, and their comments should be heeded. Everybody recognizes that the state of the fishery is in trouble and needs fixing. ***The ASMFC must steer management objectives away from the harvesting goals (and sector fights!) that have brought us to where we are today, toward maximizing species abundance which by definition means prioritizing the welfare of the fish over all other concerns.***

Of course, I would like to: increase regulatory enforcement and be happy to pay for it with a stamp; and to not have fecund females targeted at all; to regulate against treble hooks and favor any other regulation that will better protect the bass; and to outlaw gill nets etc.

But most of all ***I want the ASMFC to recognize the social and economic importance of wild striped bass along the western Atlantic shoreline as being a unique and valuable recreational fishery. So valuable in fact, that it should be managed as such to the exclusion of any commercial harvesting much like snook, tarpon, bonefish, redfish etc. A moratorium on harvesting gives the ASMFC the best tool to accomplish this and to save the striped bass fishery.***

Thank you,

Dean Clark,
(508) 769-9765
seaflycapecod@gmail.com

Kevin H. Cassidy
P.O. Box 2618
Orleans, MA 02653
April 9, 2021

Emilie Franke
Fisheries Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

Re: Comments on the proposed Amendment 7 to the Atlantic Striped Bass Fishery Management Plan Public Information Document dated February 2021

Thanks to the Commission and staff for your work in organizing and presenting the issues and options in the PID and for this opportunity to submit Comments.

My interest in the environment and ecology, reaches back to my studies of environmental systems management in the mid-1970s. My career included jobs as an executive attorney for start-up businesses and Fortune 500 companies. Since my retirement I have volunteered as a "citizen-scientist," sampling and testing estuary water quality for the town of Orleans, MA, and for the Provincetown Center for Coastal Studies. My appreciation of our coastal ecology also has been catalyzed by 50 plus years of recreational fishing for striped bass. I have no economic interest in the resolution of the PID issues.

The attached pages offer specific views on the PID questions. But first, in this transmittal letter I will speak to **PID Issue 1: Fishery Management Plan Goals and Objectives.** My business experience relating to large and small enterprise management suggests a key imperatives for managing in the face of uncertainty.

There is no guarantee that the striped bass population will recover. If this past year or so has taught us nothing else, it has taught us that there are no guarantees. This Commission has tasked itself with a crisp, if Herculean, goal: "**To perpetuate**, through cooperative interstate fishery management, migratory stocks of striped bass…" I have emphasized the first words of your goal. Your terminology is neither accidental nor loose. Merriam-Webster says it means: "to make perpetual or **cause to last indefinitely**, [For example*], **perpetuate the species**." [Bold typeface added.]

This goal is certainly Herculean in the sense that there are countless influences, which, for better or worse, affect migratory striped bass stocks and over which we have no control. These include short and long-term climatic conditions, local and regional water quality, the timing of spawning, unforeseen technologies, and many other factors. Each of these factors, and others, will substantially influence the outcome of any management decisions we make. It is axiomatic that some of our decisions to guide the future will be wrong, swayed by the unpredictable effects of these "outside" factors.

To repeat, the striped bass population is not guaranteed success. We do not know and cannot control where the line will fall between survival or failure of the species. Thus, given our goal to perpetuate the species, the judgmental margins of our decisions must necessarily err on the side of preservation of the species. Bearing in mind the possibility that an outside event, whether natural or human-caused, can irrevocably affect bass stocks, actions pursuant to this Amendment 7 should ensure perpetuation of the species and avoid the risk of eroding safeguards against potential unforeseen ravages.

Philosophically, this dictates that we manage for abundance, not for mere sustainability. Inherent in the term sustainability is the notion that actions which maintain mortality numbers near the edge of extinction are satisfactory. This cannot be the case. In any year, a catastrophe from major conditions out of our control has the potential to create an exponential downward spiral in the population, even to irrelevance or even extinction. Therefore, we must manage not to a population that is merely sustainable, but toward one that is abundant.

In the following pages express my views on additional specific issues of the PID.

Respectfully submitted,

Kevin H, Cassidy

ISSUE 2 Regarding Biological Reference Points

Is the 1995 estimate of female SSB still an *a*ppropriate benchmark for determining stock status?

Replacing the 1995 numbers with the 1993 numbers would undermine the philosophical imperative noted in the transmittal cover letter. There does not seem to be a compelling reason to lower 1995 numbers to 1993 levels. There is no certainty that doing so would improve the perpetuation the striped bass. Without a clear basis for improvement, and in consideration of the risk of adverse consequences of reduced targets and triggers derived from the 1993 numbers, the better approach would be to leave the 1995 reference undisturbed. Further, in the face of such uncertainty, a change to the 1993 numbers might well be perceived by the public as being motivated by a ”political” (in the general sense) desire to erase the embarrassment of continually missing the targets and triggers.

Is a 25% buffer appropriate for the SSB target?

As noted in the transmittal letter, given the “manage to abundance” imperative and the risks we face from the uncontrolled conditions noted above, the 25% would seem to be too low to be viewed as a reliable buffer from the possibility that unforeseen conditions have catastrophic effect. Further, any lowering of the 25% would compound the

adverse effect of the suggestion (to lower the target to the 1993 numbers) in the preceding question.

Should the Board prioritize development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components?

All model-based reference points must, in the beginning, be tied directly to the image being modeled and in the end be tested against the image. Models call for a myriad of decisions and judgements throughout their design, development, and implementation. Each of these judgements has the inherent ability to move the outcome. It is critical that the model's parameters and decisions be transparent and auditable back to real world stock-specific reference points. In short, neither approach should get so far independent of the other as to lose that auditable connection.

What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?

Excessive parsing may well, in the nature of a red herring, distract focus from a more central point. That is, if the striped bass fisheries are managed to an overall appropriate level of abundance, the subsets mentioned above will take care of themselves. The bass will grow, reproduce, age, and geographically distribute themselves once they are truly abundant.

Issues 3 & 4 Regarding Triggers and Targets and Schedules

Which management triggers (if any) should be revisited?

At this stage it appears inappropriate that triggers or targets be made less restrictive.

What is an appropriate timeframe to respond to overfishing or overfished determinations?

A risk balancing analysis says that a delay in correcting a period of overfishing could, in any given year, coincide with an "outside" event or events that together create an exponentially catastrophic outcome. This would affect all stakeholders. Logic and probabilities suggest that a response should be as immediate as possible.

Should the fishing mortality-based triggers account for annual variability in fishing mortality?

No comment to offer. I do not understand the import (the reach) of this question. Nor do I understand how such accounting might be implemented.

What is more important, rebuilding the stock quickly, or mitigating impacts to fisheries? In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?

Rebuilding the stock inures to the benefit of all stakeholders in the long run. Actions in the short run which may handicap the recovery in the long run should be approached very cautiously, especially those actions which might be undertaken for economic or political reasons rather than directly in furtherance of perpetuation of the species. On the other hand, the proposal to end striped bass fishing for ten years would appear to be somewhat draconian and should be entertained as a solution of last resort, having first actually tried all other practical remedies. (As a matter of full disclosure, my view

of a 10 year moratorium may be slightly colored by the statistical unlikelihood of my still being around when it is concluded.)

Issue 5 Regarding Regional Management

Should separate regional management programs be pursued for the Chesapeake Bay and the ocean region, which includes the Delaware Bay/Hudson River stock complex?

Consistency in language and application of laws and regulations has inherent benefits. Among these are ease of understanding, adherence, verification, and improved enforcement. Treatment differentiation creates an unnecessary and complex tangent. This is especially true given that large populations appear to overlap during migrations and seasonal locations. Identifying and quantifying the success of regional management for regional and area-wide populations exponentially complicates this auditing process.

If so, how should the Board determine the appropriate allocation of fishing mortality between the two regions?

This question only emphasizes the complexity which arises should this tangent be pursued.

Should the Board consider any other areas (e.g. Delaware River or Hudson River) for separate regional management programs? If so, what level of data should support additional regional separation?

No, for reasons stated above.

Should development of similar assessment tools be prioritized to support regional management programs for other areas of the coast?

No, see above.

Issue 6 Regarding Conservation Equivalency

Should CE be part of the Striped Bass FMP?

CE exacerbates the shortcomings of the regional split-apart proposed in Issue 5 by introducing the element of potentially self-serving proposals. For this and for concerns set forth in Issue 5, should the Commission wish to consider CE deviations, they must be presented with support allowing them to be fully auditable as to implementation and results. Any failure of the CE plan to provide protection would have been achieved under the full plan should be applied as a subtractive the next year. That is, the following year the CE state would have to exceed the full plan target numbers by the underage of the CE year.

Should the Board restrict the use of CE based on stock status, data restrictions, differences from neighboring state, and/or any other potential issues?

Not sure where this might lead. The use of CE should be a narrow exception. For instance, restriction or unavailability of data to support the exception does not appear to be a valid reason to support an exception.

Should the Board provide a strict definition for 'equivalency' (e.g., equal to the level of harvest the fishery would have achieved under the standard measure)?

Yes. Absolutely.

Should more quantitatively rigorous and clearly defined data requirements be required as a pre-requisite for CE proposals to be considered?

Yes. Necessary for accountability and auditability

Should there be limitations to how many CE proposals a state can submit?

Because of my concern about dissipation of focus, if CE is considered, I believe the number of submissions should be limited.

Should CE be limited to time and areas with unique ecological characteristics (e.g., presence of smaller striped bass)?

Again, it's not clear to me that CE should be considered at all, but if the Commission chooses to allow it, the narrower the limits, the better.

Given state-level MRIP estimates are often less precise than regional or coastwide estimates, are these data used appropriately to develop CE proposals?

No.

Given the variability in recreational catch and harvest from year-to-year, how do you evaluate effectiveness of CE programs following implementation?

One of the compelling reasons not to allow it. It makes the whole process more complex, and stakeholders may have incentives to jerrymander. Reconciliation of moving parts is always problematic.

Issue 7 Regarding C&R Mortality

Should management focus on reducing the rate at which fish die after being released alive

through additional gear restrictions similar to recent actions regarding the use of circle hooks?

Yes. A majority of fishers seem to accept, based on experience and pure intuition, that the circle hook regulation is a favorable and successful action.

Issue 7 represents an opportunity to address a significant contributor to fish mortality dramatic enough to warrant the Commission's special attention. This is especially so when there are corrections which will decrease C & R mortality while engendering limited economic impact and inconvenience and thus, hopefully, limited controversy. Based on observation and experience, there appear to be a handful of actions which if adopted either voluntarily or by regulation have the potential to improve the survival of released bass.

Some of the following suggestions would call for increased effort by some fishers or the development of different technique by others, but in the end, the increase in abundance would benefit all.

Use of Gaffs The use of a gaff is a contributor to unnecessary mortality of returned fish. That use of this tool is still permitted for landing striped bass came as a surprise to me. There doesn't appear to me to be any compelling reason to allow it. The bass is not dangerous fish to handle. In fact, it is quite common practice for fishers to seize a bass by the lower lip for unhooking. For larger fish, nets are available to handle all but the most unusually large sizes. For those anglers fishing for trophy sized fish, just like they have equipped themselves with heavy gear for the extraordinary battle they would

anticipate, they will need to equip themselves with the appropriate gear they might need to avoid unnecessary (including gaffing) injury to the bass.

Deeply Hooked Fish It appears that the current thinking is shifting away from trying to remove a hook from a deeply hooked fish to cutting the line as close to the hook as is practical. I believe there is an instinct on the part of many fishers such that the fish is better off if the hook is removed. While that may be the case where the hook has not penetrated vital organs, it appears that the gouging twisting to the hook is, on the whole, more harmful than just cutting it loose. If this has an accepted basis in research, I suggest an aggressive public education program.

Multiple Treble on Lures Long casts often call for big lures. Big lures, unless modified by their owners, tend to carry multiple treble gang hooks. Often, while the front hook is embedded in the fish's mouth, the second, and sometimes a third hooks swing wildly during the fight, gouging trenches through the scales, meat, and fins on the sides and punctures the belly and eyes of the fish. Even small lures with treble hooks tear up smaller fish. The commission should consider action which will limit the use of gang hooks and certainly multiple gang hooks having these effects. Many fishers today remove some or all of the treble gang hooks upon purchase. This may not require legal prohibition of gang hooks altogether. For instance, some ingenuity on the part of the tackle manufacturers may come up with a design similar to the circle hook. With the hook points turned inward the hooks may not have the same devastating effect as today's trebles but may still be a quite capable tool.

Hook Barbs Barbs on hooks not only contribute to damage to a fish while being retrieved, but also exacerbate the issues associated with time out of water. The barb,

while often easily dealt with, sometimes extends the time it takes to remove the barb and release the fish. A fish flailing about with a multiple gang-hooked lure tends to make the fisher more cautious and slower on the release.

This may be an area where the development of a new paradigm is in order. For instance, if the fishing community adopted the attitude that a fish caught despite certain handicaps is a worthwhile challenge.

Measurements and Photos These items bear directly on the time out of water issues. Killing a fish for the sole purpose of measuring it and weighing it seems to be out of step with modern thinking. It does not appear that either of those actions are necessary for fishers to achieve satisfaction in their sport. Again, it may take a shift in the paradigm, but current day technology is up to the task of allowing a fish to be brought near, photographed, and accurately measured without being removed from the water. Such devices are available online today. This is an area where I would suggest that the Commission be pro-active in assisting the fisher community, and the manufacturers to adopt a shift in thinking. If these devices are indeed accurate there is no reason to believe that fishing contests can be judged on this kind of electronic basis.

Issue 8 Regarding Recreational Harvest Limits

Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released? Should management consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released?

Recreational fishers, by definition, do not fish for a living. This means they are dependent on time away from their jobs, be it weekends, vacations, or other windows of fishing opportunity

the exact timing of which is often beyond their control. An unexpected closing coincident with pre-committed vacation time would be problematic. Fishers may become reluctant to commit to fishing vacations and weekend trips for fear of closure. This affects not just the recreational fishers but also all the local businesses that service them such as bait and tackle shops, marinas, hotels and motels, charter and guide services marinas and chandleries.

What are some ways to improve awareness and stewardship of the resource?

How should an RHL overage or underage be addressed?

RHL overage should be addressed as immediately as possible by subtracting the overage amount from the next cycle. No adjustment for underage.

Should stock status be considered when handling an RHL overage or underage?

No. This might lead to undesirable *ad hoc* decision making outside the structured normal process.

Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?

Stiffer penalties for violations likely to negatively affect bass mortality directly or indirectly. Increased enforcement activity, especially during the times of the big runs, and just plain having more feet on the ground.

RECEIVED APR 20 2021

Michaelcheck, William

From: Michaelcheck, William
Sent: Friday, April 9, 2021 2:32 PM
To: Michaelcheck, William
Subject: Striped Bass

Categories: Mariner

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission 1050
North Highland Street, Suite 200A-N
Arlington, Virginia 22201

To the Striped Bass Management Board

I am an avid striped bass fisherman who lives in New York State. I fish many days each year and maintain a boat at Montauk. I contribute to the economy by paying to dock my boat, purchasing tackle, hiring guides, and sometimes staying in motels and eating at restaurants.

I believe the focus of Amendment 7 should be to lower fish mortality without lowering the reference points. We need a coastwise education effort to teach fishermen how to handle fish.

Regarding Amendment 7:
#2 Biological Reference Points
The reference points should not be changed now. We do not have adequate science to support a change.
#6. Conservation Equivalency
Conservation Equivalency should not be part of Striped Bass Management
#10. End Gill Nets coastwise for Striped Bass

Sincerely,
William Michaelcheck
Southampton, NY

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Comments on Atlantic Striped Bass Amendment 7

My name is Zach Whitener. I am striper guide in Freeport, Maine and I am a professionally trained fisheries biologist and work in Portland, specializing in stock identification.
I have comments regarding the issues outlined in the Public Information Document.

Issue 1: The current goals and objectives are suitable.

Issue 2: The Biological Reference Points should not be changed from 1995. There is no scientific basis for changing the reference points. Consistency is the only way to ensure that we recover these fish that mean so much to us and you do not win the game by changing the rules.

Issues 3 and 4: Management Triggers and Stock the 10-year Stock Rebuilding Target and Schedule from Amendment 6 must be maintained in Amendment 7. It is not going to be easy, but no one else said managing fish was easy. If it takes a moratorium on all harvest, so be it. We are past the time to act.

Issue 5: As a migratory species, we do not know enough about the origins of striped bass at time to catch to accurately hope to do successful regional management. I am a stock identification expert who has done some work with striped bass; I can say that the state of the science will not allow for successful regional management of this migratory fish. All of these discreet spawning populations co-mingle and management needs to reflect that from a fisheries management standpoint, there is only one stock.

Issue 6: Conservation Equivalency should be removed from the Striped Bass Management Plan. Consistent, coastwide regulations for this migratory species is the only way to properly manage them. A fish that might swim through 10 or so states in a given season cannot be managed differently in each jurisdiction. Pretending that Conservation Equivalencies work is what put us in this mess. We cannot continue to pretend that Conservation Equivalencies work with this species.

Issue 7: Catch-and-release mortality has blood on all of our hands and recreational anglers must take responsibility. Education, combined with gear restrictions, foster and carrot and stick approach. The technical committee should continue to look into gear restrictions and seasonal

closures. Furthermore, it unfathomable to me that any state allows gaffing of striped bass; there is absolutely no argument for it.

Issues 8 and 9: A moratorium on harvest would address both of these issues.

With the fishery being overfished and overfishing occurring, it is clear that our management has let us down. We do not have time to see what might happen, what Conservation Equivalencies might sneak in, how many times a fish might be legal or illegal in a given season depending on where it happens to swim. As a fisheries scientist, it makes no sense to even being talking about changing the definition of the problem like changing reference points would do or continue to allow Conservation Equivalencies to undermine management. It is time to take bold action to address the problems in the fishery.

As a guide, I rely on there being fish. It is not academic; I cannot in good conscience take someone's money if I do not think we have a shot at catching fish. It is as simple as that. If we continue to throw caution to the wind, stay on this path of inaction and avoiding the problems in our management and in our fishery, there will not be much of a fishery to worry about. We need to manage this fishery for abundance.

Zach Whitener
Anadromous Adventures Guide Service LLC
25 Merrill Rd.
Freeport, ME
04032

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board,

I am a recreational angler from the state of Maine and I thank you for the opportunity to provide comments on the PID, below are my comments listed by issues on the PID.

Issue 1: Goals and Objective

I believe that the current goals and objectives for the striped bass fishery are sufficient and should remain unchanged. The goal of the AMFC should be to help rebuild and protect a healthy stock for years to come.

Issue 2: Biological Reference Points

I believe that the current biological reference point of 1995 is an appropriate reference year. It should remain unchanged and removed from further consideration in this amendment. The year of 1995 should continue to be used for BRP for several reasons. First, this is the year that the stock was considered rebuild after the collapse approximately a decade earlier, during this year the fishery had a high female spawning stock biomass. In addition the stock has a broad age structure, therefore the stock was not dependent on the spawning success of one size or year class. I believe that the best available science should be used for all striped bass management, currently there is no model based approach to determining a BRP, therefore 1995 is an appropriate reference year and the BRPs should remain unchanged.

Issue 3: Management Triggers

The four management triggers related to spawning stock biomass and fishing mortality remain suitable.

Issue 4: Stock rebuilding and Target Schedule

I believe strongly that the current 10 year rebuilding plan specified in Amendment 6 should continue to be used and that a plan for rebuilding to the stock to sustainable levels should begin as soon as possible.

Issue 5:

I believe that regional management should be removed from further consideration in Amendment 7. There is currently no available science to inform stock-specific or regional management. Furthermore, striped bass are a migratory species, there is no way to manage a use regional management for a species that migrates from Maryland to Maine. It concerns me that the PID refers to there being a male skewed sex ratio in the Chesapeake Bay. Current studies do not show a male skewed sex ratio, in allowing for a higher level of harvest in the Chesapeake Bay more spawning sized females will be removed from the population than is sustainable.

Issue 6: Conservation Equivalency

Conservation Equivalency (CE) should only be considered if striped bass are neither overfished, or experiencing overfishing. Striped Bass should be managed using consistent coastwide standards, CE's add greater levels of uncertainty to a management process that is already full of uncertainty. If the goal of the ASMFC is to lower fishing mortality and rebuild the stock, it is impossible to know how different management strategies affect the overall stock. If CE's must be used, they should only be allowed if

striped bass stocks are both not considered overfished and not experiencing overfishing. In addition, if they are used, states should be held accountable if their regulations fail to meet conservation objectives.

Issue 7: Recreational Release Morality

I believe that it is currently premature to address this issue in Amendment 7 given that the Massachusetts Division of Marine Fisheries is currently conduction a multi-year study to access post release mortality of striped bass. I do feel that it is important to reduce the post release mortality of striped bass anyway possible. This could be done through outreach programs aimed at recreational fishers, teaching best handling practices and promoting the use of inline circle hooks as apposed to treble hooks. In addition if the ASMFC were to consider efforts to reduce post release mortality, regulations along the line of what the state of Maine uses for the Kennebec river watershed could be a good starting point. These regulations are for May 1st through June 31st and require anglers to use a single hooked artificial lure, a single treble hook is allowed but no bait can be used. This would help to reduce mortality of breeding females when they most need protection.

Issue 8: Recreational Accountability

I believe that the issue of recreational accountability is important not only to striped bass but to all recreationally targeted species. This is a much larger undertaking; therefore, it is not sensible to address during this amendment process.

Issue 9: Commercial Allocations

I believe that the ASMFC should work with the Technical Committee to update commercial allocation as to more accurately reflect the status of the striped bass stock.

Issue 10: Other Issues

I believe that the ASMFC should continue to support research into striped bass to be able to better manage this important stock. Further research is needed to allow for science-based decisions to be made in relation to striped bass management. In addition to research on striped bass biology, projects looking to quantify the social contributions of fishing activity's both for harvest and catch and release could greatly inform management strategies. Knowing how stock health affects not only anglers but coastal communities up and down the Atlantic seaboard would give the ASMFC one more tool to help manage striped bass stocks for years to come.

I feel that there are many steps that could be taken to help better manage this precious resource but with the striped bass stock being what it is today managers need to take fast and effective issues to stop the over fishing of striped bass.

Thank you for hearing my concerns and comments,

Sincerely,

Blaise Jenner

April 2, 2021

Dear Ms. Emilie Franke and ASMFC,

Please find below my comments in regards to the Public Information Document for the Striped Bass

I. Issue 1:
   A. Are the existing goals and objectives of Amendment 6 still in line with current fishery needs and priorities?
      1. **Yes, all 3 of the goals are still in line with current fishery's needs. We do need to re-establish a broad age structure and perpetuate migratory stocks of striped bass.**
   B. Which specific priorities (if any) are missing from the existing goal or objectives?
      1. **Perhaps there is an opportunity here for more clear priorities - I would recommend for management of the fish first, then the fishermen. This is relevant in terms of the second goal, "to allow commercial and recreational fisheries consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock," we need to first reestablish a self-sustaining spawning stock and broad age range.**
   C. Which of the existing objectives (if any) should be removed or refined?
      1. **I do not support the removal of any of the stated objectives. I do support coastwide consistency of implementation measures and believe this should remain the goal, especially during periods when the stock is declared overfished.**
   D. Do the existing objectives balance the need for management stability, flexibility, and regulatory consistency?
      1. **Unfortunately, given the state of the current striped bass population, we do not have liberty of management flexibility.**
   E. Which of these three themes do you value most?
      1. **I support the goals perpetuating migratory stocks of striped bass, as well as management that allows for self-sustaining spawning stock and broad age structures. I also support the goal of restoration and maintenance of essential habitat.**
II. Issue 2:
   A. Is the 1995 estimate of female SSB still an appropriate benchmark for determining stock status?
      1. **Yes, I support only 1995 as the appropriate benchmark for determining stock status. Changing the year from 1995 would be another unknown variable to management of best, and**

vastly deleterious at worst. The time to lower the bar for stock rebuilding is not now.

B. Is there a better empirical reference year or other empirical approach that should be considered?
    1. **No. We do not have the data support using another year or other empirical approach for management. Further, given the current state of the population, we do not have the margin of error to use a year other than 1995.**

C. Is a 25% buffer appropriate for the SSB target?
    1. **Yes**.

D. Should the Board prioritize development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components?
    1. **No, these are a migratory fish. They should be managed as such until we have the data to support otherwise, which currently does not exist.**

E. What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?
    1. **Abundance of large fish, not necessarily for anglers, should be a priority. We know that these are the fish that are going to give us one of the best shots at bringing back a striped bass population of significant numbers. A diverse age range should also be a priority, especially given the poor spawning years of 2019 and 2020.**

III. Issues 3 & 4:
- **A. The management triggers and rebuilding timelines are consistent with the biological understanding of the species and should be maintained.**

IV. Issue 5 - Regional Management:
- **A. Please remove Regional Management from the Amendment. We do not have strong models nor current existing data to support regional management.**

V. Issue 6 - Conservation Equivalency:
- **A. A unified approach is the best approach right now, especially during a period when the stock is declared overfished. We do not have data to support that there is true equivalency when these programs are instituted. Further, the CE programs as they exist today add yet another variable that clouds the collection of quality data.**

VI. Issue 7: Recreational Release Mortality
- **A. Attempts at decreasing recreational release mortality should be made. I view this as perhaps one of the most low-hanging fruits in bringing back the population. Many of the actions I observe on the**

water that lower the chance of a successful release can be addressed through education. In ME and MA, most of the behavior I see is not malicious but rather from folks just not knowing how to minimize their impact on the fish. Anglers have touch points with various resources that could provide education, from bait and tackle stores to online when purchasing a license. These would be good places to provide some basic harm reduction strategies (water temps, salinity levels, possible swapping of treble hooks for inline J hooks, crushing bars). Further, more data collection on harm reduction strategies would be helpful in shaping future catch and release best practices.

VII. Issue 10: Other Issues

A. **Gill netting for striped bass should be banned in the Atlantic.**
B. **Habitat restoration is also an area with vast potential, particularly in Maine. The previous efforts to restore vitality to the Kennebec River have proven to be largely successful. The recovery we saw with the Edwards Dam removal speaks to the numerous benefits of removing the Lockwood and Shawmut Dams. This would open more vital habitat for striped bass for spawning as well as through a lot of season.**
C. **Education for recreational anglers should be addressed - this is a relatively low lift effort and has great potential to be a harm reduction strategy in terms of release mortality. In Maine, to obtain a recreational lobstering license, one has to read a document with robust educational information and take a quiz - perhaps something similar could be utilized.**

The vast majority of the recreational fishing community is here and willing to play a role in giving these fish a fighting chance. Adherence to these recommendations will provide the scaffolding for us to bring bass back in big numbers.

It is not just the fish that are at stake. From guides, to bait and tackle shop owners to their employees, to fly shops flanking the coast, communities have been built around striped bass. Hundreds of families are supported from this revenue. It is not a far reach to say that striped bass is the most important species in the recreational saltwater fishing sphere, from MD to ME. These fish are far more valuable in the water than they are dead.

Lifelong friendships and mentorships are formed over sharing newly crafted flies, reminiscing over memorable catches and recounting the even more memorable fish that broke off, still in the ocean to be caught once more. None of this is possible if the fish are not alive, in healthy numbers, and with a wide breadth in year classes. When these fish are gone, the friendships, mentorships, and a viable source of income for hundreds of families up and down the coast are too. For what gain is that worth it?

Lastly, I did want to give a word of thanks for this public comment period and the high quality meetings being held for each state. The patience, professionalism, and dedication to hearing each voice has not gone unnoticed.

Sincerely,



Charlotte Bloom, a recreational angler in southern Maine

April 8th, 2021
Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and Members of the Board:

Thank you for this opportunity to comment. My name is Will Poston, and I am a recreational angler. Below you will find my preferences on the issues first and then a brief comment.

1. Fishery Goals and Objectives: **The current goals and objectives are satisfactory and should be removed from further consideration**.
2. Biological Reference Points: **The current 1995 reference points should remain unchanged**. The fact that this issue was included—and the misleading and editorial comments were included in the PID—are disappointing and contribute to the growing lack of public faith in ASMFC.
3. Management Triggers: If consistently followed, management triggers 1-4 will promote long-term health of the stock. **These triggers are suitable, but the Board should be held to the triggers and be accountable. Trigger 5 could be revisited, because it appears to be ineffective in addressing recruitment**.
4. Stock Rebuilding Targets and Schedule: **The current 10-year rebuilding timeline should not be changed**. Additionally, it is unacceptable that ASMFC has supported rebuilding plans with low chances of success. It would be optimal to rebuild the stock as quickly as possible.
5. Regional Management: This issue should be removed from consideration. **The stock is overfished and subject to overfishing; modifying how the stock is managed at its current state is misguided and irresponsible. I support removing this issue from consideration.** Additionally, based on my understanding, the science to support regional management is not yet available.
6. Management Program Equivalency (Conservation Equivalency): time and time again, CE has been abused, which contributed to the stock's current 25-year low condition. **At no point, should CE be considered while the stock is overfished and/or overfishing is occurring**. Additionally, future use of CE should rely on the implementing states using acceptable data and being accountable for the efficacy of their alternative regulation(s).
7. Recreational Release Mortality: Efforts to reduce recreational release mortality should be without a doubt sought. **Outreach, education, and research should all be considered. However, there is notable value in a dead, released fish, much like there is a price on a commercially-caught fish**. Dead discards in the recreational sector are a reality and will continue to be. Further, they underscore the immense participation and economic contributions within the recreational sector.
8. Recreational Accountability: the recreational sector carries much of the burden when it comes to killing fish and the condition of striped bass. However, recreational accountability is a much larger concept that requires special consideration and

discussions at various levels of fishery management. **I recommend tabling this issue for a broader, coast-wide consideration**.

9. Coastal Commercial Allocation: n/a
10. Any other issues concerning the management of Atlantic striped bass: I would like to see more enforcement and opportunities for the recreational sector to participate in data collection and research.

I am a 25 year old fly fisherman and have spent much of time fishing out chasing striped bass. I've had many good outings and have caught many striped bass. However, according to dozens of older anglers, I haven't seen anything. I've never experienced a healthy and abundant population of striped bass. Following management processes over the past couple of years, I know that I've never fished a population like we had in the early or 2000s. I also realize that all of this was avoidable. Striped bass are too important to me personally, my friends, the fly fishing community, local economies, and the entire East Coast. I hope that this species can be expediently rebuilt, properly managed, and I can participate in a fishery that resembled the "good ol' days."

Sincerely,

Will Poston

Maryland, private recreational angler

David Price
311 Laurel Blvd
Lanoka Harbor, NJ 08734

April 7th, 2021

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I want to thank you for affording me the opportunity to openly comment on the Public Information Document (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass. You may be familiar with the passion that the striped bass can provoke among its faithful followers all along the eastern seaboard and how the pursuit of this fish has become a way of life for many. Luckily for me I was one of the unfortunate souls to be introduced to this amazing game fish and spend the last twenty years chasing the striped bass at all hours of the night from New Jersey to Massachusetts; I would not have wanted it any other way. As a result of this love affair with the striped bass it is my responsibility to act in any manner to protect this precious resource and it is my hope that you strongly consider my considerations.

Issue 1: Goals and Objectives

At this time, the current goals and objectives of the Atlantic Striped Bass Fisheries Management Plan as noted in the Amendment 6 are sound and logical with regards to today's fishery. I strongly feel it would be unnecessary to make any changes in this area of the management plan. The reason being is that the current goals and objectives need to continue to support the importance of building a robust spawning stock that is diversified with many year classes of fish. This in turn will hopefully reduce recruitment variability with a spawning biomass that is well structured with many age classes of striped bass.

Issue 2: Biological Reference Points

It is my belief that the 1995 reference year continues to be the most appropriate year due to a robust population with a broad age structure of fish. Keeping the 1995 reference point makes sense due to the lack of model-based reference points thus, the need to use empirical reference points based on given years.

Issue 4: Stock Rebuilding and Target Schedule

The current 10-year rebuilding timeline that has been outlined in Amendment 6 should be maintained with a strong rebuilding plan set into action immediately. Anything less would significantly undermine the chances of striped bass of making a timely and full recovery. If we are going to be serious about protecting and restoring striped bass keeping this deadline is crucial.

Issue 6: Conservation Equivalency

Conservation Equivalency is a management tool that should be used with caution. The reason for this is (CE) simply allows for greater variability in the way states can manage striped bass. This is especially concerning when the striped bass are overfished and currently experiencing overfishing. It would be logical to end the use of (CE) with the current state of the fishery as we can not afford greater variability in management from state to state especially when the odds of meeting reduction targets of 18% are low.

I would like to take one last opportunity to thank you for this opportunity to mention my concerns with regards to the (PID) for Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass. I am optimistic that the ASMFC can come to a decision that will ultimately lead to the rebuilding of Americas greatest fish. It is my hope that we can all enjoy a healthy striped bass resource in the near future so that we may all reap the benefits of this wonderful fish. This of course will be dependent of the important decisions that are made today.

Sincerely,

David Price

COMMENTS OF FORMER MARYLAND SENATOR GERALD W. WINEGRAD ON THE ASMFC DRAFT AMENDMENT 7 TO THE INTERSTATE FISHERY MANAGEMENT PLAN FOR ATLANTIC STRIPED BASS.

Thank you for your work on properly managing the population of Atlantic striped bass (*morone saxitalis*), known to me as rockfish. I hope you will read and consider my comments on both developing a new FMP for this important species and acting to further restrict harvest for the 2022 fishing year.

I write because of my fear that history is repeating itself from the 1970s and 1980s when fishery managers and political leaders allowed rockfish populations to collapse despite grave warning signs of overfishing, reproductive failure, and population declines.

While we have not reached that low ebb for rockfish yet, unless the ASMFC acts soon and aggressively to limit catch, we could again reach that point. A red light is flashing with the ASMFC acknowledging that the rockfish is overfished, overfishing is occurring, and the important biological reference points and goals of the current FMP are not being met.

Thus, it is imperative that the ASMFC act to further restrict commercial and recreational harvest. Addendum VI to Amendment 6 to the Atlantic Striped Bass FMP does not go far enough with its 18% reduction in harvest. Addendum VI was adopted to reduce all state commercial quotas by 18% and implements a 1-fish bag limit and a 28" to less than 35" recreational slot limit for ocean fisheries and a 1-fish bag limit and an 18" minimum size limit for Chesapeake Bay recreational fisheries.

However, the ASMFC did not adjust commercial quotas to achieve this commercial reduction, keeping them the same for 2020 as in 2017-2019. Under an abused system of conservation equivalency, Maryland and other states contend that the 18% reduction is being met by hard to calculate conservation equivalency measures for recreational catch. This includes my state of Maryland, the most critical spawning state.

Despite the ASMFC Addendum 6 and significant problems with rockfish populations, why has the ASMFC failed to lower by even one fish the commercial quotas for Chesapeake Bay rockfish? This is the absolute best way to assure the 18% reductions required are met. At a minimum, the ASMFC should have and still should reduce these commercial quotas by 18% for the Chesapeake and all states with a commercial rockfish fishery.

Here's what the ASMFC allowed to happen in my state of Maryland which is essentially the status quo for commercial harvest:

<u>Maryland Chesapeake Bay Commercial Quota From ASMFC</u>
2017 – 1,471,888 pounds
2018 – 1,471,888 pounds
2019 – 1,471,888 pounds
2020 – 1,445,394 / Reduced to 1,442,120 pounds for exceeding the quota in 2019.

Maryland Chesapeake Bay Commercial Fishery Harvest
2017 – 1,439,760 pounds
2018 – 1,424,303 pounds
2019 – 1,475,162 pounds
2020 – Data Not Available

So, despite serious concerns over the last four years over rockfish populations and overfishing, and after the ASMFC declares the fishery overfished with overfishing occurring and the critical female rockfish biomass grossly below targets, what was the response in reducing harvest in the Maryland Chesapeake Bay? The status quo so far and likely the same for 2020.

What was the response in Maryland's Atlantic fishery?

Maryland Atlantic Commercial Quotas From ASMFC
2017 –90,727 pounds
2018 – 90,727 pounds
2019 – 90, 727 pounds
2020 – 90,727 pounds

Maryland Atlantic Commercial Fishery Harvest
2017 – 80,457 pounds
2018 – 79,836 pounds
2019 – 82,753 pounds
2020 – Data Not Available

Again, the status quo prevails so far.

All of the above data is from Maryland DNR and shows that the net affect was an increase in harvest of rockfish in the Chesapeake Bay and Atlantic by Maryland commercial fishermen! Not only did the ASMFC fail to reduce quotas, but Maryland also failed to take the necessary measures to reduce commercial harvest. In fact, the commercial harvest increased and in the critical Chesapeake Bay spawning center actually exceeded the ASMFC quota in 2019.

The current status of rockfish declines and overfishing demands that the ASMFC should not wait until after the release of a new FMP in 2022 to act—action is demanded now. It would be at least until the 2023 fishing year for states to be required to adhere to any new restrictions in the 2022 FMP and such a delay might trigger a drastic downward spiraling of rockfish populations and substantially hinder recovery. The existing FMP calls for more substantial harvest restrictions as the ASMFC Stock Assessment found that:

> 1. Female spawning stock biomass (SSB) and fishing mortality rate (F) are estimated and compared to target and threshold levels (i.e., biological reference points) in order to assess the status of the stock. The female SSB threshold was estimated at 202 million pounds with a female SSB target of 252 million pounds. The 2018 benchmark stock assessment

estimated female SSB in 2017 at 151 million pounds, which is 25% below the SSB threshold, indicating the stock is overfished. Further, the SSB was an alarming 40% below the target; and

2. The F threshold was estimated at 0.24 and the F target was estimated at 0.20. Fishing mortality in 2017 was estimated at 0.31, which is 29% above the F threshold, and an alarming 55% above the F target.

Further, I feel certain that the ASMFC is aware of the most recent Maryland rockfish Young-of-the-Year surveys documenting an alarming decline in reproductive success. Recruitment well below long term average occurred in 6 of the last 9 years with 2 of the last 5 years rating as the 8th and 9th lowest level of young rockfish in 67 years of surveys. The 2.48 YOY index in 2020 was 78% below the long term average of 11.5; the 3.37 in 2019 was 71% below long term average.

Since at least 70% of the Atlantic striped bass population spawns in Chesapeake Bay, mostly in Maryland rivers, this documented decline in recruitment, coupled with the findings of the Stock Assessment, signals that substantial reductions in harvest, both commercial and recreational, are needed now.

As uncomfortable as it is economically and politically, the ASMFC must act to prevent another collapse which led to moratoriums and the federal Atlantic Striped Bass Conservation Act (1984) that resulted in mandatory coastwide conservation measures and closures in other states, including Virginia. This law gave the ASMFC its current authority to force states to take actions to conserve this valuable species for the first time.

After introducing legislation to close Maryland's striped bass fishery, I testified before the Congressional Committee considering rockfish legislation in support of a coastal moratorium at the invitation of its sponsor, Representative Claudine Schneider (R-RI). This hearing led to the eventual enactment of the federal law known as the Studds Act after the former Massachusetts Congressman. Maryland led the way enacting a regulatory closure that lasted five years, 1985-1990.

Under pressure to lift the Maryland moratorium, a Rockfish White Paper group was legislatively mandated. Representatives of the competing facets of the fishery were tasked with devising an agreement on when the moratorium should be lifted and how the take of rockfish should be managed among fishing interests, commercial and recreational. I served as the Senate representative.

Somewhat miraculously, we all reached agreement on solutions with lifting the moratorium when the DNR Rockfish Young-of-the-Year survey showed strong spawning success by attaining an average of at least 8 over three years. We also decided the Maryland catch would be divided with commercial and recreational fishermen getting 42.5% each of the quota and charter boats receiving a 15% share. This was adhered to and strictly enforced for a few years.

I have fished the Bay since I was 8 years old and live on Oyster Creek, about 250 feet from the Bay in Annapolis where I still fish but mainly crab now. I do not take advocating further restrictions lightly but know the history of fishery management is not a model for conservation.

The collapsed sturgeon, shad, oyster, and soft clam populations in Chesapeake Bay are but a few examples of fishery managers succumbing to economic interests and refusing to restrict harvest for economic reasons.

I now will address the specific questions posed in the Public Information Document (PID) for the ASMFC draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. All of my responses are in **bold** preceded by the questions posed in the PID.

First, in response to the question, "How would you like management of the Atlantic striped bass fishery to look in the future?"

The FMP overarching purpose and elements in it should be to expedite restoration of populations of striped bass to at least the female SSB level or greater and to stabilize rockfish populations into the future and to end overfishing and assuring it does not occur again.

I would remind all that the critical element of fishery management in the United States—the precautionary principle—should be fully applied to the FMP. This means "where the possibility exists of serious or irreversible harm, lack of scientific certainty should not preclude cautious action by decision-makers to prevent such harm. Management needs to anticipate the possibility of ecological damage, rather than react to it as it occurs."

There are obviously other factors affecting rockfish abundance and reproduction beyond harvest BUT, the ASMFC and fishery managers can only control harvest. I do not think the ASMFC is able to tackle global warming, Chesapeake Bay pollution, invasive species, and other threats other than the menhaden decline. This means that the critical element for the new FMP—and right now for ASMFC—is controlling harvest to prevent harm to the rockfish resource. Conservation of the rockfish should dictate all elements of the FMP and also ASMFC actions now and in the future to prevent another population collapse of this important species.

The following responses in **bold** address the other questions posed in the PID:

(1) FISHERY GOALS AND OBJECTIVES.

Public Comment Questions: Are the existing goal and objectives of Amendment 6 still in line with current fishery needs and priorities? Which specific priorities (if any) are missing from the existing goal or objectives? Which of the existing objectives (if any) should be removed or refined? Do the existing objectives balance the need for management stability, flexibility, and regulatory consistency? Which of these three themes do you value most?

The current FMP goal under Addendum 6: "To perpetuate, through cooperative interstate fishery management, migratory stocks of striped bass; to allow commercial and recreational fisheries consistent with the long-term maintenance of a broad age structure, a self-sustaining spawning stock; and also to provide for the restoration and maintenance of their essential habitat."

These existing goals and objectives seem solid to me but perhaps the terms of the precautionary principle should be mentioned.

I am absolutely opposed to discarding elements relating to fishing mortality levels unless to tighten them and also opposed to abandoning the female SSB (see below). What should be

added is a connection to the annual Young-of-the-Year surveys in Maryland and Virginia to trigger actions beyond the current weak 75% below average for three consecutive years standard. Action should be triggered by three consecutive years of below average spawning success.

Regulatory consistency is the most important for many reasons including fairness, ability to measure and enforce compliance, effectiveness, and more certainty of outcomes.

(2) BIOLOGICAL REFERENCE POINTS.

Public Comment Questions: Is the 1995 estimate of female SSB still an appropriate benchmark for determining stock status? Is there a better empirical reference year or other empirical approach that should be considered? Is a 25% buffer appropriate for the SSB target? Should the Board prioritize development of model-based reference points and/or stock-specific reference points for the Chesapeake Bay and other stock components? What stock characteristics (abundance of large fish available to anglers, diverse age structure, etc.) should the BRPs attempt to achieve to balance the needs of diverse striped bass fisheries and the state of the resource?

The female SSB benchmark should not be abandoned. I am suspicious of this because weakening this SSB or discarding it would allow for more harvest even though it has not been met by a wide margin for years. It was scientifically set years ago—why change it? Since its use and application has not resulted in a stable or increasing population of striped bass, it would be better to tighten it. A 15% buffer is the minimum that should be permitted. The importance of a large stock of female spawners is critical and older females spawn many thousands of more eggs. Chesapeake Bay Young-of-the-Year indices showing spawning success should be used as biological markers to be achieved. For example, three straight years of below average YOY counts should trigger action to reduce harvest.

(3) MANAGEMENT TRIGGERS; AND (4) STOCK REBUILDING TARGETS AND SCHEDULE.

Public Comment Questions: Which management triggers (if any) should be revisited? What is an appropriate timeframe to respond to overfishing or overfished determinations? Should the fishing mortality-based triggers account for annual variability in fishing mortality? What is more important, rebuilding the stock quickly, or mitigating impacts to fisheries? In other words, do you prefer significant changes to rebuild the stock quickly, or smaller incremental changes over time to gradually rebuild the stock?

First, based on the precautionary principle prioritizing conservation of the resource comes first. Of course, I prefer significant changes to rebuild the stock quickly rather than smaller incremental changes over time to gradually rebuild the stock. Did prioritizing harvest and a go-slow restoration work for shad, sturgeon, soft clams, oysters, etc.? It is wishful thinking to believe that without much stronger conservation actions the striped bass stock will recover. Just look back to 1984 for why. We are on the precipice of another collapsed fishery so bold action is needed. The tail should not wag the dog where minimizing harvest disruptions prevent recovery or, worse yet, precipitate a collapse.

The appropriate timeframe to respond to overfishing or an overfished determination is as quickly as possible. Delay can lead to accelerating declines in the population of rockfish as has been the case in the past and of late.

The female SSB benchmarks and targets and goals should not be abandoned nor should the F threshold at 0.24 and the F target at 0.20. They should be tightened until the rockfish population is restored and overfishing is ended. When either F threshold is not met for a given year, the ASMFC should decease commercial quotas and assure the states act to decease recreational landings as well.

Specifically, I suggest that the existing management triggers established in Amendment 6 should be kept or adjusted (changes in bold) as follows: 1) If the fishing mortality threshold is exceeded in any year, the striped bass management program must be adjusted to reduce the fishing mortality to a level that is at or below the target within one year. 2) If female SSB falls below the threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed **5 ~~10~~-years**]. 3) If the fishing mortality target is exceeded in two consecutive years and the female SSB falls below the target within either of those years, the striped bass management program must be adjusted to reduce the F to a level that is at or below the target within one year. 4) If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed **5 ~~10~~**-years]. 5) If any Juvenile Abundance Index shows recruitment failure (i.e., an index value lower than **~~75%~~ average** of all other values in the dataset) for three consecutive years, then the Board will **~~review the cause of recruitment failure (e.g., fishing mortality, environmental conditions, and disease) and determine the appropriate management action.~~ act to reduce the fishing mortality rate within one year until the Abundance Index is at or above the long term average for at least three consecutive years.**

(5) REGIONAL MANAGEMENT.

Public Comment Questions: Should separate regional management programs be pursued for the Chesapeake Bay and the ocean region, which includes the Delaware Bay/Hudson River stock complex? If so, how should the Board determine the appropriate allocation of fishing mortality between the two regions? Should the Board consider any other areas (e.g., Delaware River or Hudson River) for separate regional management programs? If so, what level of data should support additional regional separation? Should development of similar assessment tools be prioritized to support regional management programs for other areas of the coast?

The current management system that allocates separate quotas and requirements for the Chesapeake Bay and Atlantic for Maryland and Virginia should be kept intact but commercial quotas should be reduced. Quotas ought to be established for the recreational fishery. This spawning stock in Bay waters requires special management attention and better protective measures especially for egg-bearing females as the Chesapeake Bay is the cradle for at least 70% of the Atlantic striped bass population.

As documented above, the ASMFC has dropped the ball in failing to reduce commercial quotas in recent years where Maryland's commercial harvest actually increased in 2019 over its quota despite the ASMFC dictates for an overall reduction of 18% including the recreational harvest.

(6) MANAGEMENT PROGRAM EQUIVALENCY (CONSERVATION EQUIVALENCY).

Public Comment Questions: Should CE be part of the Striped Bass FMP? Should the Board restrict the use of CE based on stock status, data restrictions, differences from neighboring state, and/or any other potential issues? Should the Board provide a strict definition for 'equivalency' (e.g., equal to the level of harvest the fishery would have achieved under the standard measure)? Should more quantitatively rigorous and clearly defined data requirements be required as a pre-requisite for CE proposals to be considered? Should there be limitations to how many CE proposals a state can submit? Should CE be limited to time and areas with unique ecological characteristics (e.g., presence of smaller striped bass)? Given state-level MRIP estimates are often less precise than regional or coastwide estimates, are these data used appropriately to develop CE proposals? Given the variability in recreational catch and harvest from year-to-year, how do you evaluate effectiveness of CE programs following implementation?

I am against the use of conservation equivalency (CE) as it is nearly impossible to accurately determine the level of harvest for the fishery under state-set equivalencies. Use of CE also allows for wide divergencies from one state to another in fishing regulations. The task of determining actual harvest rates under CE is made even more difficult by the nature of recreational fisheries. For example, I challenge the ASMFC striped bass management board to ascertain a scientifically rigorous assessment of CE for measures taken by states recently in recreational fisheries to achieve an 18% reduction in harvest. The ASMC determined that to achieve this 18% reduction through Addendum VI was to reduce all state commercial quotas by 18% and implements a 1-fish bag limit and a 28" to less than 35" recreational slot limit for ocean fisheries and a 1-fish bag limit and an 18" minimum size limit for Chesapeake Bay recreational fisheries.

This was not done in Maryland and some other states. Also of importance is to equitably balance catch limits by user groups, commercial, recreational, and charter boats. This can be done by quotas set by the ASMFC.

The ASMFC acknowledges "an essential tension between managing the striped bass fishery on a coastwide basis while allowing states to deviate from the coastwide standard, and thus creating regulatory inconsistency among states and within shared waterbodies**." CE should not be allowed and the specific measures adopted by the ASMFC should be adhered to by all states. However, it would be best that specific measures and quotas were adopted by the ASMFC on a regional basis including for Chesapeake Bay and other key spawning states. Such measures also should be developed for states who do not allow a commercial fishery as opposed to states that allow both commercial and recreational fisheries.**

For further details on problems with CE, see my comments in pages 1 and 2 above.

(7) RECREATIONAL RELEASE MORTALITY.

Public Comment Questions: Should management focus on reducing the rate at which fish die after being released alive through additional gear restrictions similar to recent actions regarding the use of circle hooks (e.g., banning gaffing or the use of treble hooks)? Should management focus on reducing effort in the fishery in order to reduce the total number of striped bass caught and released? Should management consider seasonal closures when environmental conditions are unfavorable to striped bass survival when released? What are some ways to improve awareness and stewardship of the resource?

Since the striped bass fishery is predominantly recreational and an overwhelming majority of the catch is released alive, measures must be adopted to reduce mortality in such releases. The beach in my community on Chesapeake Bay near Annapolis has been littered during rockfish season with dead rockfish discards. Mandating the use of offset circle hooks when using live bait should be an easy step for the ASMFC to take. The ASMFC also should prohibit the use of treble hooks. These requirements should apply to all commercial hook and line fishing as well.

In states like Maryland where the use of circle hooks is required recreationally, many fishers, including on charter boats, are not complying with this mandate. The ASMFC must assure that proper enforcement mechanisms are in place for FMP measures such as circle hooks and other regulations.

Since the circle hook requirement only applies to use of live bait, the ASMFC should enact measures to limit recreational fishing targeting rockfish during the warm summer months when hooked rockfish are more susceptible to dying from being hooked. Maryland has done this but on only a limited basis. The 9% mortality rate for released rockfish goes up during warm water periods. Other time and area closures to reduce rockfish mortality should be adopted as well and should apply to commercial hook and line fishing.

(8) RECREATIONAL ACCOUNTABILITY.

Public Comment Questions: Should the Board consider implementing an RHL for recreational striped bass management? How should an RHL overage or underage be addressed? Should stock status be considered when handling an RHL overage or underage? Are there additional accountability measures the Board should consider for managing the recreational striped bass fishery?

The ASMFC should adopt an annual recreational harvest limit (RHL) or quota for rockfish as is done for commercial catch and for other recreational fisheries, such as summer flounder and black sea bass. If the RHL is projected to be exceeded in a given year, the recreational fishery must be shut down or measures adopted to keep within the quota. This was done in Maryland when the 1985-1990 moratorium was lifted. The recreational catch rather quickly exceeded the quota in 1990 and was shut down. If there is an overage in any given year, it must be subtracted from the following year's quota as with the commercial quota.

(9) COASTAL COMMERCIAL QUOTA ALLOCATION.

Public Comment Questions: Should this Amendment address commercial allocation or be considered in a future management action? Is the 1972-1979 landings period still an appropriate baseline for the coastal commercial allocation? Should other allocation approaches be considered? Should the coastwide quota be explicitly set on an annual basis, or following an updated stock assessment or benchmark? Should regions with the necessary data be able to use a harvest control rule where commercial quotas are set annually based on exploitable biomass?

The ASMFC new striped bass FMP needs to change its methodology for setting the coastal commercial allocation and each state's commercial quota. The current system is flawed using data as a base from the 1972-1979 landings period. However, the new system should not be used to increase quotas. In light of the overfished stock, overfishing that is still occurring, and the failure to achieve female biomass spawning stock, quotas need to be lowered.

I am at a loss as to why the ASMFC failed to lower the commercial quotas when Addendum VI called for an 18% reduction in such landings.

(10) OTHER ISSUES RAISED IN PUBLIC COMMENTS.

Public Comment Questions: How would you like management of the Atlantic striped bass fishery to look in the future? After reading the above issues, are there any other topics that should be addressed in Amendment 7? Some examples may include: • Impacts due to climate change, including possible loss of prey due to changing environmental conditions; • Habitat degradation; • Limited resources for law enforcement; and • Research priorities.

See page 4 above for how I would like management of the Atlantic striped bass fishery to look in the future.

As to other topics, I feel strongly that the issue of the continued ocean trawl harvest of menhaden in Virginia by Omega Protein for its rendering plant in Reedville, VA still needs to be addressed. While the ASMFC finally reduced the annual catch limit from 87,000 tons annually to 51,000 tons in 2017, Omega defied the cap still taking 87,000 tons. Forced to do so by the Secretary of Commerce by a proposed moratorium, the 51,000 ton limit is in place now but the overage needs to be deducted and the 51,000 ton annual removal of this critical menhaden resource in Chesapeake Bay should be reduced further.

Maryland has banned such ocean trawl fishing used for menhaden for more than a half-century.

This was the prime food resource for striped bass and many other critters including Osprey. Rockfish have suffered from chronic wasting disease likely related to menhaden decline in the Bay region. See this rockfish below suffering from chronic wasting disease.



Finally, enforcement continues to be a problem with rockfish management. Poaching is common and there have been large federal and state stings and convictions with tens of thousands of rockfish illegally taken. Also, other fishing regulations are often violated as well. Enforcement needs to be bolstered and violations taken seriously for any FMP to achieve its goals.

Respectfully Submitted,

Gerald W. Winegrad

1328 Washington Drive
Annapolis, MD 21403 410-280-8956
gwwabc@comcast.net

My name is Corey gammill and I am a guide on Nantucket Island. I make 100% of my income from guiding, the tackle shop I own and commercial bay scalloping.

I firmly believe that Striped Bass are a KEY fish to the Northeast fishery and should be protected in a proactive manner. I was on the call on March 18th and agree with much of what was said, but want to reiterate some key points.

While ASMFC staff wants to do the right thing and cares tremendously about the fishery they are limited from a lack of data that they can respond to. Because of this, regulations have been used over the last twenty years that isn't enough because they think they are solving one problem and they are solving another. Data modeling is being used to make a "best guess" on what the future will look like if a slot limit is put in place.

As much as it will anger some I do agree that the fishery should become catch and release for the next 5-10 years until the fishery is rebuilt.

I do understand that there will still be mortality of fish as many fish die from improper handling. This 9% assumption which is based off of one study needs to be proven and tested. I actually beleive the number is correct, but I think we can bring the number down if we can factually say "leaving a fish in the water while releasing it gives it a 2x likelihood to survive" or a fight longer than 1 minute reduces the survival rate by 3x. This is where the research NEEDS to be, to help fishermen release fish properly.

For instance, it has been proven that a bluefish who is bleeding is 9-11X more likely to die.[1] [2] This is AWESOME info, because we can start to ask questions about how we can keep from hooking blues in a way that reduces bleeding? eliminate treble hooks? smaller hooks? If this study can be done with bluefish it should be done with Bass. I firmly believe if we can eliminate treble hooks, we will see less damage to a fish's mouth and ultimately less bleeding a lower release mortality rate, as is the case with bluefish.

If we can not go to complete catch and release, I do think the slot limit needs to be adjusted. The largest recruiting class is just about to enter it and for long term health of a fishery we NEED to protect those fish. I am asking that you all not just manage by looking at historical numbers and projecting forward, but by segmenting the stock into different age groups and realistically looking to see the affect of letting that age group be harvested will do.

As of now ASMFC values a 24 inch fish equally with a 38 inch fish and that needs to change. No fish larger than 36 inches should be allowed to be killed. Period. I am all for commercial fishermen making their money, but lets protect the 26-32 inch fish that are the most plentiful and lets let the breeders swim on. Maybe think about about a slot for both commercial and

---

[1] Factors Affecting Catch-and-Release Mortality of Bluefish: fabrizio, Scharf, Shepherd, Rosendale (2008)
[2] "Williams (1995) reported 97% survival in jaw-hooked fish but only 68.7% survival for gut-hooked fish observed for 7 d."

recreational of 32-36 and adjust that slot annually based on protecting those large year classes? This would at least prove to the stakeholders that you are paying attention to what the fishery and not just pulling on the few levers that you have.

So in Summary

a) Wish we could just catch and release fish.
b) If that is NOT an option, than we need to protect the size fish that produce the most and healthiest eggs and we need to protect the fish that are about to enter the slot size.
c) Most importantly though, extensive research needs to be done to see how we can lower the release mortality rate and use that information to educate users. I would be jaw dropped if eliminating treble hooks didn't adjust the release mortality rate from 9% to 4-5%. ***It is important to remember how many new anglers have entered the fishery in the last five years and how few of these anglers know how to take a J hook out of a fishes mouth, let alone a treble hook.***

April 7, 2021

Atlantic States Marine Fisheries Commission

Re: Amendment 7 to the Atlantic Striped Bass Fishery Management Plan

Thank you for providing the opportunity for the public to comment on the proposed Amendment.

Sadly, as indicated by the crashing population of the Striped Bass, the current management plan, as amended is failing. I've been a recreational fisherman for over thirty years, both in the Chesapeake and ocean. I've witnessed the ups and downs in the population along with near unregulated commercial harvest, absent substantive penalties of the Menhaden by commercial harvest.

In at the last couple of centuries, American's have been very efficient at killing, harvesting, trapping and fishing many species into extinction. We have learned that wiping out a species is easy, if we over-harvest or destroy habitat. Regrettably, priorities for the principle food of the Rockfish have been to make cat food, fish oil, etc. benefiting companies who make large political contributions in their quest to avoid more restrictive harvest quotas.

Specific comments:

Any plan to manage a species and its habitat in a piecemeal way with multiples states and regulatory inconsistency, is destined to failure.

Data collection and reporting must be comprehensive and universal across all jurisdictions.

Any plan that is not revised but seventeen years ago [Amendment 6] is likely not relevant and not able to react swiftly to man-made and environmental changes. [Page 7 clearly indicates actions contained in Amendment 6 failed.]

Anglers have learned a lot in handling/releasing fish since the Diodati/Richards mortality rate estimates of twenty-five years ago. A new study should be conducted.

Lastly, the definition of insanity is to keep repeating the same actions, while hoping for a different outcome. Drastic measures to save and improve the stock of Striped Bass must be taken. Nibbling around the edges while generating more paper will not work.

Respectfully,

Bruce A. Julian
9 Troon Place
Weems, VA 22576
bruce_julian@hotmail.com

cc;
Pat Geer, Chief of Fisheries Management, VMRC

RISING TIDE ANGLERS

April 9th, 2021

Dear Emilie Franke and ASMFC Striped Bass Management Board,

I'm writing today to ask that ASMFC stay the course with Striped Bass management.

As a fishing guide in the Northeast for 18 seasons I've witnessed a major decline in the Striped Bass stock. For my business and for future generations, I ask you to manage this stock for abundance and to maintain the same reference points used since the last time the species was healthy.

Comments for the Striped Bass PID are below.

Thank you,

Zakary Robinson

Captain Zak Robinson, *Owner and Guide*

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Zak@Risingtideanglers.com
www.risingtideanglers.com
42 Coakley Rd, Portsmouth NH 03801

RISING TIDE ANGLERS

1. **Fishery Goals and Objectives**
   Status Quo

2. **Biological Reference Points**
   Status Quo

3. **Management Triggers**
   Status Quo

4. **Stock Rebuilding Targets and Schedule**
   Status Quo

5. **Regional Management**
   Status Quo

6. **Management Program Equivalency (Conservation Equivalency)**
   CE should not be utilized any time the stock is overfished or if overfishing is occurring. States utilizing CE should be held accountable if overfishing occurs due to CE.

7. **Recreational Release Mortality**
   Efforts should be focused on education and outreach to promote best practices.

8. **Recreational Accountability**
   Recreational accountability should be implemented for states utilizing CE.

9. **Coastal Commercial Allocation**
   Status Quo

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iFishMD.com

Sport Fishing Charters

March 23, 2021

Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Re: Striped Bass PID

Dear Emilie Franke,

As a Maryland-based licensed professional fishing guide and sales representative for a recreational fishing boat manufacturer, I recognize that the economic value of sport fishing is derived from anglers taking trips. Given that striped bass are vastly the most desired fish in our natural resource that drives the sport fishing industries in our state, I offer the following comments to the Striped Bass PID:

1. Goals
Striped bass should be managed for abundance to encourage the highest levels of participation. Creels limits should be low and utilize restrictive slot limits instead of participation-killing closures. While management should consider regulations that reduce release mortality rates (ie. circle hooks with bait, prohibit treble hooks, in-water releases. etc.), dead discards will need to go up if we are to maintain participation while reducing overall mortality as we move harvested fish to released fish if we are to continue to foster the best economic use of the fish.

2. Biological Reference points
ASMFC should maintain the current reference points. They have provided anglers with decades of abundance that has led to high levels of participation, thus benefiting the sportfishing economies that are dependent upon these fish.

3. Management triggers
ASMFC should consider triggers to prevent overfishing in the future. These triggers should include spawning success YOY, recruitment, and current SSB. Triggers should be in place to ensure corrective action is taken prior to significant cuts being necessary as they

4. Stock Rebuilding Targets and Schedule
ASMFC should use a 10 year plan to rebuild the stocks to levels previously set that have led to decades of high participation fishery. A 10 year plan will allow for variances in spawning success and recruitment to help achieve abundant SSB levels. I would like to see incremental successes every 3-5 years to ensure moving towards the 10 year goals.

Homeport: Annapolis Maryland
410-533-1435 | ifishmd@gmail.com

5. Regional Management
I believe regional management should be a key component to the best management of the species. However it is empirical that it be based upon accurate and current data. In order to utilize a regional management plan the data MUST come first.

6. Management Program Equivalency (Conservation Equivalency)
I support a states ability to construct regulations within a management plan. However I feel that states have abused CE. Therefore I support CE with great restriction and allowing only minor changes to state or regional management plans. (Ie shifting of dates)

7. Recreational Release Mortality
I support measures to reduce the mortality rates such as gear restrictions like circle hooks with bait, no treble hooks, no gaffing of striped bass, etc. However I believe release mortality to be a function of high levels of participation and thus benefiting the use of the fishery the most. Dead discards should not be demonized as much as it is by those who view the fish purely as a product. Anglers buy boats, fishing gear, charter, buy fuel, stay in hotels, etc. to pursue these fish in great numbers. Fostering the lowest mortality rates while accepting mortality of the the releases makes for the greatest benefit to the local economy and businesses.

8. Recreational Accountability
I believe more frequent intercept surveys could provide better data in conjunction with accurate reported charter data.

9. Coastal Commercial Allocation
I believe a full independent economic study on the value of the fish should be done prior to any increases in commercial allocation increases.

10. Any other issues concerning the management of Atlantic striped bass
I believe the successful redfish management plan should be a model for striped bass management.

Sincerely,

Capt. Greg Shute,
Maryland Fishing Guide FGR202
Independent Sales Rep for Judge Yachts

Striped bass PID, letter to ASMF, 3/19/2021

My grandfather built a cottage on the lower Potomac River in 1939. He took me fishing when I was a kid as my father did. I'm now 64 and have a love for the water and fishing.

We used to catch lots of spot, blow toads, bluefish 2-4 pounds and bigger, croaker and eels were a problem getting in crab pots. Now-a-days your lucky to catch a few croaker and taylor blues only. All the striped bass we catch today in the fall are running 19-23" on average. The big migratory bass have not migrated into the Bay for 4 or 5 years now.

I am just finishing an excellent book 'The Nature of Nature' by Enric Sala describing species diversity and ecosystem evolution. How removing one species effects all species in an ecosystem.

My point is and I think its obvious, is the depletion on a massive scale of menhaden out of the Chesapeake Bay by a private, for profit company. Up to a theoretical 30 some tons +/- are taken every year. When you remove 90 %+ of the bottom of the food chain, it negatively effects the rest of the food chain, especially predator fish like our striped bass. They become malnourished and feed upon other species I've mentioned early.

Not to mention the fact that menhaden are filter feeders, filtering more water per individual than an oyster.

Before you penalize those of us who love the bay with restrictions, take a hard look at the real problem and address it!

Thank you.

Tscharner D. Watkins III / Chairman Virginia Agriculture Council

3-16-21

Emilie Franke

Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission (ASMFC)
1050 North Highland Street, Suite200A-N
Arlington, VA 22201

Subject: Striped Bass PID

Dear Madam:

I am Charles Denton a public stakeholder and resident of Whitehaven Village Maryland along the Wicomico River, a tributary of the Chesapeake Bay. I have noticed a decline of “Rock Fish” and menhaden (their food) in our Bay river over the last ten years.

My comments for the Amendment 7 to the Atlantic Striped Bass Fishery Management Plan are:

1. I believe the ASMFC and East Coast States have failed to provide effective fishery management for our striper population for years. Once again, we are looking at overharvesting / overfishing. The fishery science tweaks, and state harvest regulations have failed.

   I recommend the AFMSC close the fishery to harvest of any kind completely for a period of years like the successful closing of the 1980s. During this closure, the technical committees can study the population numbers and determine what has not worked and develop a conservative science-based harvest limit to allow a growing and sustainable fish abundance.

2. Available menhaden for striped bass food in the Chesapeake Bay should be thoroughly evaluated and measured. I believe a lack of food in the Chesapeake Bay is having serious negative impact on abundance.

You may contact me at the address I have provided below.

Respectfully,

Charles Denton

2764 Whitehaven Rd

Quantico, MD 21856

540-535-6382

notnedrc@gmail.com

March 30, 2021

To: ASMFC
Arlington. VA
C/O Emilie Franke, Fishery Management Plan Coordinator

From: Eric F. Summers
111 Perkins Street #86
Jamaica Plain MA 02130

Dear Emilie Franke and the ASMFC,

Thank you for the opportunity to provide my personal comments on the PID on Amendment 7 to the FMP for Atlantic striped bass.

I am a retired physician scientist from Massachusetts with a lifelong interest in the habitat and biology of the Atlantic coast. Over the past 40+ years I have regularly snorkeled and fished along the coasts of Massachusetts and also Maine and Maryland. I may have some perspective to offer on the changes occurring along the coastal waters over that time. To me, the fish are not primarily food, they are the life of our coastal waters. I find the stiped bass in particular to be the most amazing, beautiful and iconic species within our waters. The evidence of their decline (again) grieves me very much. I feel that urgent and decisive action is needed to rebuild a healthy, abundant and resilient striped bass population for the sake of ocean and fish lovers to come.

My comments on the PID of Amendment 7

Issue 1:

The existing goal and objectives of FMP for striped bass **should not be changed**. Building and maintaining a healthy, diverse, sustainable stock is essential for the future of the stiped bass. This is more true now than ever as environmental challenges like climate change are more present. I place more value on healthy survival of the fish population over short term fishery economics. Durable economic benefits depend on a healthy fish population.

Issue 2:

The 1995 estimate of female SSB is still an appropriate benchmark and **should not be changed**. I believe that the striped bass population is in decline, is not diverse and is in trouble. Now is the time for all of us to sacrifice as needed to meet that goal of building a healthy stock as represented by the population existing in 1995.

Issue 3: We should **stick with the current management triggers**.

Issue 4: We should **stick to the 10-year rebuilding timeline** beginning as soon as possible.

Issue 5:

In this time of worrisome decline in the striped bass population, I believe that **we should not consider regional management.**

Issue 6:

I believe that the practice of implementing conservation equivalency is a threat to the stiped bass population and **should not be undertaken**. All states and individuals should deal with a uniform management plan to limit divisiveness, promote an "all for one" cause and make practical management most tenable.

Issue 7:

I think that mortality is an issue to consider, but that implementation and enforcement are difficult and probably will not be very effective. This issue is best addressed through education via well placed signage and information provided upon license application. However, that said:
I favor mandating circle hooks for still bait fishing. However, circle hooks are not practical for cast and retrieve or trolling.
I favor of barbless hooks for all recreational fishing. Barbs hurt fish and people and they are not critical for retaining fish on the line.
I favor disallowing double trebble hooks on lures as they cause damage to face, eyes and gills. I also favor no trebble hooks at all.
I do not favor implementing extra focus on these rules as I fear they might distract from the central goals of the FMP which is to firmly set limits based on clear data and clear triggers.

I think that reducing fishing effort might be effective if place at specific times and places. I think there could be specific bans on fishing at certain bottlenecks during the migration. Cape Cod Canal is an example. The fish basically have no choice but to go up through that narrow waterway flanked by miles of easy shore casting access. They are hungry as they move north and they are too vulnerable in the Canal in my opinion. I think there should be a complete ban or a ban on certain days to allow safe passage through the Canal. There may be other bottlenecks along the migratory route worth considering for similar restrictions.

Issue 8:

Recreational accountability sounds good, but I don't see how it can be implemented. Therefore, I believe that a RHL **should not be implemented** as it would draw ineffective resources from the current overall management effort. In the future, I think it is worth considering a tag system for recreational fisherman who want to keep fish. I don't think this is the time to consider this.

Issue 9: Quotas should be based on solid, vetted data. I do not favor regional assessments or he use of harvest control rules.

Issue 10, what I would like to see:

- Firm, clear, uniform rules that can be flexibly implemented based on solid, vetted data in a way that results in building and preservation of a healthy, abundant and resilient striped bass population in our coastal waters.
- I would like to see more focus placed on protecting the largest fish. The larger fish are by far the most important pound for pound when it comes to reproductive capacity. They are too valuable to take and eat. I think **setting an upper size limit on fish** taken by either recreational or commercial fishermen would be a pivotal step in building and protecting the population.
- In times of extreme decline, I think we should not hesitate to implement a moratorium on the taking of any striped bass, recreational or commercial. I feel that now may be a time of threatening decline and we should strongly consider an immediate moratorium.

Thank you again for your efforts on behalf or our wild and vulnerable fish. Lets help them thrive into the future!

Sincerely,
Eric Summers MD, PhD
111 Perkins Street, Apt 086
Jamaica Plain, MA
617-694-6347

My name is Luis Tirado, I am a registered Maine Guide, licensed USCG Master Captain, Vice President of the Maine Association of Charter Boat Captains, Saltwater Fishing Columnist, and Podcaster. Most importantly, I am a life long Striped Bass angler. I caught my first Striped Bass at the age of five in 1989, and for the last thirty two years I have devoted my life to these fish. I have made them part of my identity.

I have seen how great this fishery can be, and I am also seeing what it is becoming, or worse, where it is headed. It is my belief that we are at a pivotal moment in the Striped Bass' history, and I also believe that major changes in management are necessary.

The first issue that must be addressed is that the ASMFC must be held accountable, and must adhere to their own requirements. Amendment 6 clearly states that the stock must be rebuilt in ten years. To date, there is no plan and we are already two years into the ten.

The second issue is that 1995 should be where the Biological Reference Point stays, and changing the BRP should be removed from Amendment 7. We should not be lowering the standards to make the numbers work.

It is my belief that when it comes to Management Triggers, Triggers 1-4 in Amendment 6 are suitable for the goals of Striped Bass management. I would like to see the board revisit Trigger 5, as I am not convinced it is an appropriate indicator.

As far as Regional Management goes, given the current status of the Striped Bass, I would like to see the board remove this issue from Amendment 7.

The next issue that must be addressed is Conservation Equivalency. I would like to see CE removed all together. We will never get consistent management with states doing their own thing. It is my belief that CE has no place in the management of Striped Bass, especially when the fishery is deemed overfished.

When it comes to recreational release mortality, and recreational accountability it is my belief that both topics are too broad and should not be confined to this Amendment process.

In closing, I want to see this fishery managed for abundance. I am tired of watching the ASMFC play the game of how little we can do, while still trying to take the most. As I stated in my introduction, I have dedicated my life's identity to these fish. I want to be able to pass on a healthy fishery to my children and to future generations. I am willing to do the work, I expect the ASMFC to do the same.

Dear ASMFC:

If ASMFC wants to adopt a plan to minimize or eliminate the need to make annual changes to the striped bass fishery, they must control the recreational fishermen's catch. The ASMFC has never done this.

Each state must issue a limit number of striped bass permits. Each permittee can only harvest a certain number of fish. Once their amount is caught, they can no longer fish for striped bass. Another option would be a tagging system like the commercial fishermen have.

Seven of the last eight years, the spawn of striped bass has been average or above in the Virginia section of the Chesapeake Bay. Virginia is not the problem, nor are the commercial fishermen the problem; the problem lies north of our state with the recreational fishermen. They have never been required to provide a sound accounting for their harvest.

The commercial fishermen in Virginia have lost over 12 million dollars in revenue because of the unfair system that is in place. Virginia owns more square miles of the bay than Maryland does, yet we have a much smaller striped bass quota than Maryland.

As a producer state for striped bass, we should be telling the northern states how many fish they can harvest, rather than the northern states telling us how many fish we can harvest. Under the Fishing Management Plan in the ASMFC charter on page 13, it says that the social and economic impacts and benefits must be taken into account and the commission has failed to do this since the beginning.

Douglas F. Jenkins

President
Twin Rivers Waterman's Association

Public Comment on Striped Bass Amendment 7 PID
From Bobby Weagley (Virginia) via phone to Emilie Franke (ASMFC) on March 31, 2021

Commercial fishermen, striped bass VA

28 in size limit in VA, killing a lot of female fish that are perfectly good to sell but we have to throw overboard; once quota is filled, done fishing for striped fish, could use quota a lot quicker and not throw over so many fish; If I have 1000 pounds, often have to double the catch to get keepers

Fishermen will fish for big fish because it brings them more money, this year it was cold so we have not put nets in; If I put the nets in now I would only catch large fish that I would have to throw back; I'd rather wait until fall when I can keep most of what I catch

SSB is down, but these rockfish don't live forever; if we don't catch them they are going to die of old age anyhow; Have lots of big fish ready to spawn, can't catch them and they die off; after they spawn then there are lots of small fish around; based on striped bass age and how long they live, you should be able to predict when there would be so many small fish; here in VA I've fished for 60 years and there are cycles: one year when you catch a lot of big spawners then after that you catch small fish again

Too many regulations are causing more damage

Circle hooks are a good idea

28 in size limit (commercial) is a bad idea