



Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • 703.842.0741 (fax) • www.asmfmc.org

MEMORANDUM

TO: Atlantic Striped Bass Management Board; Atlantic Striped Bass Plan Development Team

FROM: Atlantic Striped Bass Advisory Panel

DATE: October 12, 2021

SUBJECT: Advisory Panel Comments on the Scope of Draft Amendment 7 Options

AP Members in Attendance: Dave Pecci (ME – for-hire/recreational), Bob Humphrey (ME – comm. rod and reel/for-hire), Peter Whelan (NH – recreational), Patrick Paquette (MA – rec/for-hire/comm), Andy Dangelo (RI – for-hire), Michael Plaia (RI – comm/rec/for-hire), Kyle Douton (CT – recreational), Al Ristori (NJ – for-hire), Chris Dollar (MD – fishing guide), Dennis Fleming (PRFC – fishing guide/seafood processor/dealer), Bill Hall (VA – recreational), Kelly Place (VA – commercial), Jon Worthington (NC – recreational)

ASMFC Staff: Emilie Franke, Katie Drew

The Atlantic Striped Bass Advisory Panel (AP) met via webinar on September 29, 2021 to provide feedback on the options developed for Draft Amendment 7, including the scope and clarity of the options presented. The following is a summary of the AP's comments and discussion for each issue.

After Draft Amendment 7 is approved for public comment, there will be a separate AP meeting to discuss the AP's preferred management options.

General Comments

- The AP noted overall concern about the complexity of the draft document and the large number of options presented, which would be difficult to present at public hearings and would make the public comment process challenging.

Management Trigger Options

- Some AP members noted concern about options that would eliminate one of the SSB triggers given the importance of these triggers in the management program.
- AP members noted general concern about options that would allow the Board to defer management action until the next stock assessment. The AP noted there is already public concern about the Board not responding quickly enough to management triggers, and these options would delay the timeline for management response even further.

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- AP question for PDT: Why is there no option for the SSB target trigger to trip after two consecutive years?
 - If the PDT already considered this, the AP recommends the PDT be prepared to provide their rationale to the Board and the public; there may be questions since there is an SSB target trigger option for three consecutive years, but there is no option for two consecutive years.
 - Staff indicated the PDT would follow-up to provide rationale.
- AP question for PDT: Is there redundancy between the SSB target trigger options and the management action deferment options?
 - The AP noted there are multiple options in those categories that address both the SSB target and the F target, and may seem redundant.
 - Staff indicated the PDT would follow-up to provide clarity on these options.
- AP question for science staff: Is there updated information on retrospective bias in the striped bass stock assessment?
 - Dr. Katie Drew indicated the striped bass stock assessment models have a retrospective pattern where fishing mortality tends to be slightly overestimated and spawning stock biomass tends to be slightly underestimated. She will follow-up with more detail on how the retrospective pattern has changed over time.

Measures to Protect the 2015 Year Class (Ocean Recreational Fishery Size Limit Options)

- One AP member recommended the PDT streamline this section of the document to better integrate the tables and figures; additionally, adding a table showing the estimated size-at-age in inches would be helpful.
- One AP member noted the moratorium option should more clearly specify which moratorium timelines are being considered (e.g. 2 years? 5 years?).
- AP members also noted the following concerns about the size/slot options:
 - Some AP members noted concern from the for-hire industry about slot limit options and a large minimum size option and associated negative impacts on the industry.
 - Some AP members noted support for the 35-inch minimum size option considering the simplicity for compliance and enforcement as compared to a slot limit.
 - Some AP members noted concern about higher discards associated with slot limits.

Recreational Release Mortality Options

- Seasonal closure options:
 - There was some concern about state coordination and accountability associated with the regional closure option. AP members noted the regional closure option should clearly specify how the regions would be defined.
 - Some AP members noted that even a 2-week closure could have a significant, negative impact on fishing businesses, particularly in northern states.

- There was some support for using MRIP effort data to inform closure options, but there was a question and concern about high PSEs and whether the directed trip percentages are accurate, especially for the ocean regions of Maryland, Virginia, and North Carolina.
- Gear restriction options:
 - Most AP members expressed significant concern about including the gear restriction options. The AP noted the following concerns:
 - The list of gear restriction options seems to target certain types of businesses and would negatively impact a specific component of the recreational sector.
 - Gear is used differently across states and the benefits of a gear restriction would vary widely and cannot be measured.
 - There are continued concerns about enforcement of gear restrictions.
 - The Addendum VI circle hook requirement was informed by relatively more research and more widespread public support; the gear restriction options presented in Draft Amendment 7 do not have the same support or scientific backing.
 - AP Question for PDT: How was this list of gear restrictions identified?
 - Staff indicated these options were based on public comment received on the Draft Amendment 7 Public Information Document and Addendum VI.
- Outreach options:
 - One AP member noted that any required outreach should be more clearly defined and should be focused on best practices for handling of large fish, especially trophy fish.

Conservation Equivalency (CE) Options

- Some AP members noted the importance of accountability and associated concern that CE accountability measures are not included in the draft options.
 - Staff indicated the rationale for not including accountability options could be noted the draft document. Accountability options were not developed due to the challenge of separating the performance of management measures from factors like changes in angler behavior and fish availability. This makes it difficult to evaluate the effectiveness of CE programs, so the PDT focused on options on the front end of the CE process, like options to restrict when CE can be used and requirements for CE proposals.
- One AP member noted general concern about using MRIP for CE proposals and whether a PSE threshold of 50 is still too high.

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

Emily:

Rather than belabor last night's discussion I thought I would jot down a few comments for you to share with the board regarding Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

As with any state, Maine has its own unique nuances and circumstances, and as Maine's representative to the Advisory Panel I make the following comments:

4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES

4.2.1 Size and Bag Limits (Measures to Protect the 2015 Year Class)

Ocean Recreational Fishery: Measures to Protect the 2015 Year Class

We've waited a long time for an opportunity to catch and keep striped bass in Maine. Our previous slot limit of 20-26" was a very sensible approach as it would have less impact on (then) current SSB, younger cohorts can be harvested at a higher rate with less impact and it's a better fish for anglers to catch and keep because there is less waste and less bio-accumulation of toxins and heavy metals. Just as a very strong age class approached that slot, we changed to a 28-35" slot to hopefully achieve an 18% reduction in mortality, which meant the bulk of our fishery would remain catch and release. I understand the reasons Maine chose to go this route rather than seek a CE: consistency, enforcement, ease of administering and implementing.

I, like most other Maine anglers have patiently waited and watched the 2015 cohort grow to a point where they would finally enter that 28" minimum. Now, as they're on the brink, we learn of a proposal to implement a 35" minimum. This, with very little exception, would maintain our fishery as primarily catch and release. The goal was to reduce mortality by 18% and the 28-35 slot was supposed to accomplish that. Did it not work? Do we even know at this point? And if it did, why impose further restrictions?

4.2.2 Measures to Address Recreational Release Mortality

Clearly, catch and release mortality is an important metric, and trying to reduce it an important objective. If that is our goal, then actions that would maintain or possibly increase it seem to be in conflict - see above.

Among the options for consideration is Option B, Effort Controls (Seasonal Closures). In addition to projecting the possible reduction in impact on the fish, we also need to consider the impact on the fishery. Maine has a four month fishery, at best, and for the for-hire fleet it's a three month window of opportunity. A 2 week closure during Wave 4 could mean nearly a 20% loss in income opportunity for Maine's for-hire fleet.

Furthermore, that alone, regardless of gear restrictions and slot limits, would probably

result in at least an 18% reduction in mortality. Include those variables and the reduction becomes additive, placing an unfair burden on Maine compared to other states.

Maine has been at the forefront of conservation measures to protect striped bass, imposing circle hook restrictions and spawning area closures long before they were required. We have gone along with the status quo, implementing larger slot limits when and where they may not have been totally warranted. Our recreational anglers and for-hire fleet have waited patiently, and each time the opportunity to keep more fish comes along, it seems to get snatched away before it can be realized.

I get that the resource is in jeopardy and needs further protection to maintain stability but we need to remember our overall objective is to maintain a sustainable *fishery*. As someone who works on the wildlife side, I am familiar with the importance of white-tailed deer. They drive the system. Deer hunting accounts for more in license sales than all other types of hunting combined, and revenue from those licenses supports most of the conservation programs for all wildlife species, game and non-game alike. We don't have quite the same economic situation with marine fisheries, but striped bass are the white-tailed deer of Maine's recreational saltwater fishery. By continuing to impose stricter regulations and bag limits we are disenfranchising our constituents. There needs to be a balance between protecting the resource and maintaining a sustainable fishery but the scales seem to be unfairly tipped in favor of the resource, at least in Maine's case.

While it does complicate management efforts, I hope the board will give serious consideration to the idiosyncracies and nuances of each individual state, and the potential impacts on their respective fisheries when formulating management plans. We all must share the burden and make sacrifices to protect the resource, but let's make sure that burden is shared equitably.

Respectfully submitted,
Capt. Bob Humphrey
NOAA Fisheries Highly Migratory Species Advisory Panel
ASMFC Striped Bass Advisory Panel
727 Poland Range Road
Pownal, ME 04069
(207) 688-4966 o
(207) 831-7228 c
bluefinbonanza@gmail.com
bob@bobhumphrey.com

To: Atlantic State Marine Fishery Commission Striped Bass Board

From: Chris D. Dollar, Striped Bass Advisory Panel member, Maryland.

Re: Comments on Draft Amendment 7

Date: October 1, 2021

OVERVIEW

More than thirty years ago the sport fishing community celebrated the re-opening of the striped bass fishery after the five-year moratorium. At the time we heralded it as a shining example of our collective ability to bring a species back from the brink, similar to the successful effort to save bald eagles and ospreys. Today, however, stripers are once again overfished and overfishing is occurring throughout their range. The warning signs have been evident for several years, especially to those of us who spend a lot of time on the water.

Particularly worrisome are the following trends: 1. Decline of large breeder-sized stripers, which get hammered by all sectors of the fishery; 2. Successive years of poor Juvenile Abundance Indices in the Chesapeake and other spawning waters; 3. Habitat and water quality challenges are as pressing as ever, and impacts of climate change on our coastal communities are becoming more clear, and raises more questions of how it is affecting fisheries.

The draft Amendment 7 reviewed by the Striped Bass Advisory Panel is definitely a positive step in the right direction. However, some of the items as outlined could be clarified and re-written in a more concise and less complicated manner. (Nothing turns off the fishing public more than wonky jargon.) Doing so, respectfully, would also help begin to reestablish the public's trust in the fishery management process.

The recreational fishing community has been direct and clear-eyed about what we expect and deserve from our fishery management leaders and decision makers: Fairness, transparency, and decisive actions that are in the best interest of the fish. For me—and the scores of sport anglers, charter boat operators and guides, and tackle shop owners I talk with in the Chesapeake region—it simply boils down to this: Manage stripers primarily as a recreational fishery, prioritize abundance over harvest. Most anglers would gladly leave more rockfish in the water in exchange for a healthier and more robust fishery.

To truly rebuild the striper fishery, and ensure its long-term sustainability, it is going to take sacrifice from all stakeholders. Creating a new 21st century striper paradigm is imperative. Once

adopted, Amendment 7 will guide striper management for at least the next decade, an opportunity that likely will not happen again in many of our lifetimes. We need to make this one count.

Below are more specific comments and recommendations. Thank you again for your dedication to improve our public fisheries.

Respectfully,

Capt. Chris D. Dollar

“Stay Healthy...Go Fishing!”

Outdoor Communications & Fishing Outfitter

(410) 991-8468

cdollarchesapeake@gmail.com

1. Management Triggers

- Focus on/prioritize the set of triggers that recognize a decline in abundance that so that corrective action can take place in a more timely and effectual manner.
- Test management triggers adopted and/or under consideration to determine the value of the trigger in avoiding stock declines and recognizing the value of regulatory stability.
- Stay the course to ensure the stock is rebuilt, especially in face of political pressures.

2. Protect the 2015 Class of Stripers (and large breeders in general.)

- Management triggers under consideration should be vetted/tested to determine the value of each trigger may have in avoiding stock declines.
- Implement and recognize the value of regulatory stability.
- Commit to funding additional surveys to track recruitment throughout the striped bass' range, which could provide supplemental data to existing indices of juvenile abundance in the Chesapeake Bay and other spawning waters.
- Prioritize breeding sized stripers across all sectors, via seasonal closures, size limits, and other tools limiting the removal of breeding sized stripers from waters. (Here is where individual States should think “outside the box.”)

3. Recreational Accountability

- Use rigorous stock assessments that occur over two-three year intervals to assess changes to recreational catch and its impact on the population.
- Improve the Marine Recreational Information Program.
- Explore other programs that offer additional/better recreational catch data collection using electronic reporting and other programs/initiatives.
- Empower anglers with tools to better record and account for their catch, which could help improve data collection and possibly help managers better understand the pressure and harvest of the angling community.
- Consider creating a well-built coastal survey in which anglers are asked specific questions but with theme, “What do you want our striper fishery to look like?”

4. Conservation Equivalency

- Explore benefits of implementing coast-wide and Chesapeake Bay/Potomac River regulations for regulatory consistency and stability.
- Continue the development of a multi-stock model to improve managements understanding of stock dynamics.
- Restrict the use of conservation equivalency when the population is in a poor condition.
- 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.

Other Issues

Coastal Commercial Quota Allocation

- Develop/improve 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.

Forage Abundance

- Work with state resource agencies and federal commissions to accelerate the pace of implementing an ecosystem-based management structure, particularly Ecological Reference Points.
- Fully fund multi-year, coast-wide menhaden research and data collection.
- Hold Commercial Harvesters (particularly in the Reduction Fishery) fully accountable for their actions, especially when they go over their quota and cause “net spills” that waste hundreds of thousands of forage.

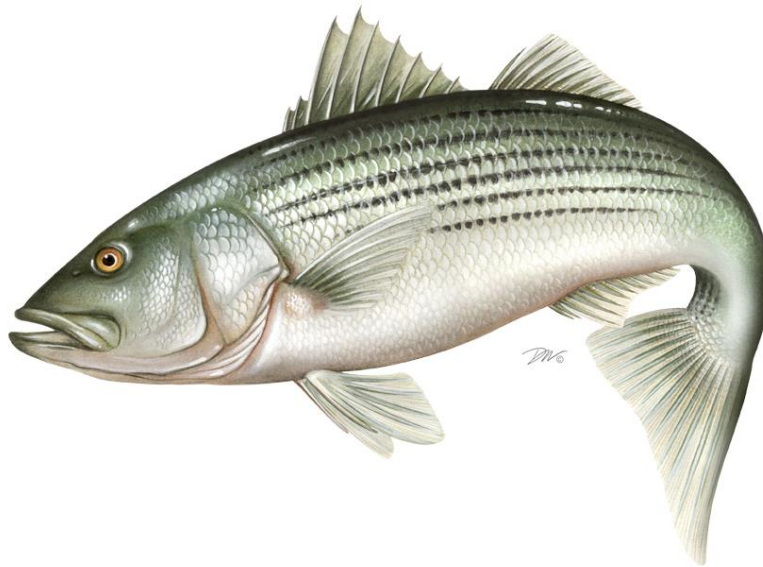
Climate Change

- Develop a stronger understanding of stock changes driven by climate change, e.g. how is it affecting spawning success rates, migratory patterns, predator-prey relationships?
- Develop a better understanding of habitat and environmental issues (water quality, water temps) that contribute to recruitment success and failure.
- Consider guidance to states on priorities or actions that may achieve specific outcomes for striped bass.

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Atlantic States Marine Fisheries Commission

**DRAFT ADDENDUM VII TO AMENDMENT 6
TO THE ATLANTIC STRIPED BASS
INTERSTATE FISHERY MANAGEMENT PLAN**



This draft document was developed for Management Board review and discussion. This document is not intended to solicit public comment as part of the Commission/State formal public input process. Comments on this draft document may be given at the appropriate time on the agenda during the scheduled meeting. If approved, a public comment period will be established to solicit input on the issues contained in the document.

October 2021



Sustainable and Cooperative Management of Atlantic Coastal Fisheries

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Public Comment Process and Proposed Timeline

In August 2021, the Atlantic Striped Bass Management Board (Board) initiated the development of an addendum to Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass to consider allowing voluntary transfers of ocean commercial quota. This Draft Addendum presents background on the Atlantic States Marine Fisheries Commission's (Commission) management of striped bass; the addendum process and timeline; and a statement of the problem. This document also provides management options for public consideration and comment.

The public is encouraged to submit comments regarding this document at any time during the public comment period. The final date comments will be accepted is **XXXXX at 11:59 p.m. (EST)**. Comments may be submitted at state public hearings or by mail, email, or fax. If you have any questions or would like to submit comment, please use the contact information below. Organizations planning to release an action alert in response to this Draft Addendum should contact Emilie Franke, Fishery Management Plan Coordinator, at efranke@asmfc.org or 703.842.0740.

Mail: Emilie Franke
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington VA. 22201

Email: comments@asmfc.org
(Subject: XXXX)
Phone: (703) 842-0740
Fax: (703) 842-0741

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1.0 Introduction

Atlantic striped bass (*Morone saxatilis*) are managed through the Commission in state waters (0-3 miles) and through NOAA Fisheries in federal waters (3-200 miles). The management unit includes the coastal migratory stock between Maine and North Carolina. Atlantic striped bass are currently managed under Amendment 6 to the Interstate Fishery Management Plan (FMP) and Addenda I – VI.

The Atlantic Striped Bass Management Board (Board) initiated Draft Addendum VII in August 2021 through the following motion: *Move to initiate an addendum to amendment 6 to allow voluntary transfers of commercial striped bass quota as outlined in the memo of July 26th, 2021 to the Atlantic Striped Bass Management Board regarding these transfers.* To address the Board motion this Addendum considers allowing the voluntary transfer of the commercial coastal quota between states.

2.0 Overview

2.1 Statement of the Problem

In August 2020, the Board initiated development of Amendment 7 to the FMP. The purpose of the amendment is to update the management program in order to reflect current fishery needs and priorities given the status and understanding of the resource and fishery has changed considerably since implementation of Amendment 6 in 2003. The Board intends for the amendment to build upon the Addendum VI action to end overfishing and initiate rebuilding. In February 2021, the Board approved for public comment the Public Information Document (PID) for Draft Amendment 7. As the first step in the amendment process, the PID was a broad scoping document seeking public input on a number of important issues facing striped bass management, including coastal commercial quota allocation. The PID had proposed considering changes to the coastal commercial quota allocation because the striped bass commercial quota allocation has been based on harvest data from the 1970s which may, or may not be an appropriate baseline. Harvester reporting during that time was not required and there is evidence that harvesters would sell fish in other states resulting in further inaccuracies in state estimates. No other ASMFC-managed species is managed with harvest data as old as that used for striped bass allocation.

In May, after the PID public comment period, the Board approved the following issues for development in Draft Amendment 7: recreational release mortality, conservation equivalency, management triggers, and measures to protect the 2015 year class. The Board did not include the coastal commercial quota allocation issue for further consideration in the Draft Amendment. Many Board members acknowledge the concerns that were raised by states and the public but found it was not the right time to address allocation. The Board noted the Draft Amendment process is not the right time to address this because allocation discussions could make the process significantly longer and more complex. Some Board members suggested addressing quota allocation in a separate management document after Amendment 7 is complete. While waiting until after the Amendment process is complete would allow for the issue to be considered, the unknown timeline for when possible new allocations could be finalized was raised. In order to provide a management option that could provide some immediate relief to states that were seeking a change in commercial quota allocation, the Board initiated this addendum which proposes to allow for the voluntary transfer of commercial allocation of the coastal quota. Many quota-managed fisheries allow for the voluntary transfer of commercial allocations

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between states (e.g., black sea bass, bluefish or horseshoe crab). This is a useful technique that can be utilized to address a variety of problems in the management of a commercial fishery (e.g., quota overages, safe harbor landings, shifting stock distributions).

2.2 Background

2.2.1 Status of the Stock

On a regular basis, 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 striped bass stock. The 1995 estimate of female SSB is currently used as the SSB threshold because many stock characteristics, such as an expanded age structure, were reached by this year, and this is also the year the stock was declared recovered. The female SSB target is equal to 125% female SSB threshold. The associated F threshold and target are calculated to achieve the respective SSB reference points in the long term.

In May 2019, the Board accepted the 2018 Benchmark Stock Assessment and Peer Review Report for management use. The accepted model is a forward projecting statistical catch-at-age model, which uses catch-at-age data and fishery-dependent data and fishery-independent survey indices to estimate annual population size, fishing mortality, and recruitment. The assessment indicated the resource is overfished and experiencing overfishing relative to the updated reference points. Female SSB in the terminal year (2017) was estimated at 151 million pounds, which is below the SSB threshold of 202 million pounds. F in 2017 was estimated at 0.31, which is above the F threshold of 0.24.

The assessment also indicated a period of strong recruitment (numbers of age-1 fish entering the population) from 1994-2004, following by a period of low recruitment from 2005-2011 which likely contributed to the decline in SSB in recent years. Recruitment was high in 2012, 2015, and 2016. In 2017, recruitment was estimated at 108.8 million age-1 fish which is below the time series average of 140.9 million fish.

2.2.2 History of the Fishery Management Plan

The first Interstate FMP for Atlantic Striped Bass was approved in 1981 in response to declining juvenile recruitment and landings occurring along 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. 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 and as a result, Amendment 5 to the Atlantic Striped Bass FMP was adopted which relaxed both recreational and commercial regulations along the coast.

The Atlantic striped bass stock is currently managed under Amendment 6 and its subsequent addenda. The most recent, Addendum VI, set measures to end overfishing, and bring F to the target level in 2020. Specifically, the Addendum reduces 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

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an 18" minimum size limit for Chesapeake Bay recreational fisheries. The measures are designed to achieve at least an 18% reduction in total removals at the coastwide level. The Addendum maintains flexibility for states to pursue alternative regulations through conservation equivalency (CE). Since catch and release practices contribute significantly to overall fishing mortality, the Addendum mandates the use of circle hooks when recreationally fishing with bait to reduce release mortality in recreational striped bass fisheries. Outreach and education will be a necessary element to garner support and compliance with this important conservation measure.

The U.S. Exclusive Economic Zone (EEZ; 3-200 miles from shore) has been closed to the harvest, possession, and targeting of striped bass since 1990, with the exception of a defined route to and from Block Island in Rhode Island to allow for the transit of vessels in possession of striped bass legally harvested in adjacent state waters. A recommendation was made in Amendment 6 to re-open federal waters to commercial and recreational fisheries. However, NOAA Fisheries concluded opening the EEZ to striped bass fishing was not warranted at that time. Following the completion of the 2018 benchmark stock assessment, NOAA Fisheries, in consultation with the Commission, is directed to review the federal moratorium on Atlantic striped bass, and to consider lifting the ban on striped bass fishing in the Federal Block Island Transit Zone (Consolidated Appropriations Act, 2018).

The Board previously considered commercial quota transfers in the FMP through Draft Amendment 5 for public comment and Draft Addendum IV to Amendment 6 for public comment. The Board did not approve the use of transfers in Amendment 5 in order to focus efforts on rebuilding the stock. The Technical Committee raised concerns that transfers had the potential to increase harvest at a time when harvest reductions were needed which contributed to the Board not approving transfers under Addendum IV to Amendment 6.

2.2.3 Status of the Fishery

In 2020, total Atlantic striped bass removals (commercial and recreational, including harvest, commercial discards and recreational release mortality) was estimated at 5.1 million fish, which is a 7% decrease relative to 2019 (Table 4). The recreational sector accounted for 87% of total removals by number.

Commercial Fishery Status

The commercial fishery is managed via a quota system resulting in relatively stable landings since 2004 (refer to Table 5 for a summary of striped bass regulations by state in 2020). There are two regional quotas: one for Chesapeake Bay and one for the ocean region (Maine through North Carolina, excluding Pennsylvania). The ocean region quota is based on average landings during the 1970s and the Chesapeake Bay quota changed annually under a harvest control rule until implementation of a static quota in 2015 through Addendum IV.

Coastal Commercial Quota

In 2020, the ocean commercial quota was 2,411,154 pounds and was not exceeded. Table 1 contains final 2020 quotas per Addendum VI and approved conservation equivalency programs and harvest that occurred in 2020.

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Chesapeake Bay Commercial Quota

In 2020, the Chesapeake Bay-wide quota was 2,998,374 pounds and was allocated to Maryland, the Potomac River Fisheries Commission (PRFC), and Virginia based on historical harvest. In 2020, the Bay-wide quota was not exceeded. Table 1 contains jurisdiction-specific quotas and harvest that occurred in 2020 for Chesapeake Bay. In 2020, commercial harvest from Chesapeake Bay accounted for 64% of total commercial landings by weight, and averaged 61% annually under Addendum IV (2015-2019).

Commercial Fishery Landings

From 2004 to 2014, coastwide commercial harvest averaged 6.8 million pounds (942,922 fish) annually (Table 2). From 2015-2019, commercial landings decreased to an average of 4.7 million pounds (619,716 fish) due to implementation of Addendum IV and a reduction in the commercial quota. Commercial landings in 2020 were estimated at 3.6 million pounds (577,363 fish). Commercial discards are estimated to account for <2% of total removals per year since 2003 (Table 4). In 2019, commercial removals (landings plus commercial discards) accounted for 13.5% of total removals (commercial plus recreational) in numbers of fish, and 12.6% of total removals in 2020.

The commercial fishery harvested 3.73 million pounds (577,363 fish) in 2020, which is a 17% decrease by weight relative to 2019 (12% decrease by number; Table 2). This decrease aligns with the 18% reduction in commercial quotas implemented through Addendum VI in 2020, although some states implemented a different level of reduction in their commercial quotas through approved state conservation equivalency plans. The ocean quota utilization was about the same in 2020 (53%) as in 2019 (51%), while the Chesapeake Bay quota utilization decreased to 76% in 2020 from 91% in 2019. Despite the coastwide decrease in commercial harvest, ocean fishery conditions for some states may have improved from 2019 to 2020, which could be attributed to the increased availability of year classes moving through certain areas. The impacts of COVID-19 on the striped bass commercial fishery likely varied among states and varied depending on timing within the season. Some states heard from industry that restaurant closures and low prices had negative impacts on the commercial season, particularly during the early part of the pandemic.

Maryland (38%), Virginia (19%), and NY (13%) accounted for the three highest proportions of the commercial harvest (by weight) in 2020 (Table 3; Figure 1). Additional harvest came from PRFC (11%), Massachusetts (11%), Delaware (4%), and Rhode Island (3%). Commercial harvest from Chesapeake Bay accounted for 64% of the total commercial harvest by weight. The proportion of commercial harvest coming from Chesapeake Bay is much higher in numbers of fish (84% in 2020) than by weight because fish harvested in Chesapeake Bay have a lower average weight than fish harvested in ocean fisheries (Table 6). Coastwide commercial dead discards were estimated at 65,319¹ fish, which accounts for <2% of total removals in 2020 (Table 4).

The ocean region regularly underutilizes its quota allocations due to lack of availability in state waters (particularly off of North Carolina) and because commercial fishing is not allowed in some states (Maine, New Hampshire, Connecticut and New Jersey which collectively share about 10% of the ocean

¹ Commercial dead discard estimates are derived via a generalized additive model (GAM), and are therefore re-estimated for the entire time series when a new year of data is added.

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commercial quota). Furthermore, the underage has increased in recent years since migratory striped bass have not been available to the ocean fishery in North Carolina resulting in zero harvest since 2012 (North Carolina holds 13% of the ocean quota) and raising questions about altered migratory pathways or preferred foraging areas as a result of climate change.

Recreational Fishery Status

For details on the most recent recreational fishery status see the [Review for the Fishery Management Plan for Striped Bass: Fishing Year 2020](#).

3.0 Proposed Management Program

3.1 State-to-State Commercial Quota Transfers of the Coastal Commercial Quota

Option A: Status quo, no commercial quota transfers are permitted.

Option B: Commercial quota transfer provision of the coastal commercial quota.

Transfers between states may occur upon agreement of two states at any time during the fishing season up to 45 days after the last day of the calendar year. All transfers require a donor state (state giving quota) and a receiving state (state accepting additional quota). There is no limit on the amount of quota that can be transferred by this mechanism, and the terms and conditions of the transfer are to be identified solely by the parties involved in the transfer. The Administrative Commissioner of the agencies involved (giving and receiving state) must submit a signed letter to the Commission identifying the involved states, species, and pounds of quota to be transferred between the parties. A transfer becomes effective upon receipt of a letter from Commission staff to the donor and receiving states, and does not require the approval by the Board. All transfers are final upon receipt of the signed letters by the Commission. In the event that the donor or receiving state of a transaction subsequently wishes to change the amount or details of the transaction, both parties have to agree to the change, and submit to the Commission signed letters from the Administrative Commissioner of the agencies involved. These transfers do not permanently affect the state-specific shares of the quota (i.e., the state-specific quotas remain fixed).

Once quota has been transferred to a state, the state receiving quota becomes responsible for any overages of transferred quota. That is, the amount over the final quota (that state's quota plus any quota transferred to that state) for a state will be deducted from the corresponding state's quota the following fishing season.

4.0 Compliance Schedule

To be in compliance with Addendum VII to Amendment 6 to the Atlantic Striped Bass Interstate FMP, states must implement Addendum VII:

Compliance Schedule to be determined by the Board.

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5.0 Tables and Figures

Table 1. Results of 2020 commercial quota accounting in pounds. Source: 2021 state compliance reports. 2020 quota was based on Addendum VI and approved conservation equivalency programs.

State	Add VI (base)	2020 Quota [^]	2020 Harvest	Overage
Ocean				
Maine*	154	154	-	-
New Hampshire*	3,537	3,537	-	-
Massachusetts	713,247	735,240	386,924	0
Rhode Island	148,889	148,889	115,891	0
Connecticut*	14,607	14,607	-	-
New York	652,552	640,718	473,461	0
New Jersey**	197,877	215,912	-	-
Delaware	118,970	142,474	137,986	0
Maryland	74,396	89,094	83,594	0
Virginia	113,685	125,034	77,239	0
North Carolina	295,495	295,495	0	0
Ocean Total	2,333,409	2,411,154	1,275,095	0
Chesapeake Bay				
Maryland	2,588,603	1,442,120	1,273,757	0
Virginia		983,393	611,745	0
PRFC		572,861	400,319	0
Bay Total		2,998,374	2,285,821	0

* Commercial harvest/sale prohibited, with no re-allocation of quota.

** Commercial harvest/sale prohibited, with re-allocation of quota to the recreational fishery.

[^] 2020 quota changed through conservation equivalency for MA (735,240 lbs), NY (640,718 lbs), NJ (215,912 lbs), DE (142,474 lbs), MD (ocean: 89,094 lbs; bay: 1,445,394 lbs), PRFC (572,861 lbs), VA (ocean: 125,034 lbs; bay: 983,393 lbs).

Note: Maryland's Chesapeake Bay quota for 2020 was adjusted to account for the overage in 2019.

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Table 2. Total harvest of Atlantic striped bass by sector, 1990-2020. Note: Harvest is from state compliance reports/MRIP (Query July 8, 2021). Estimates exclude inshore harvest from North Carolina.

Year	Numbers of Fish			Pounds		
	Commercial	Recreational	Total	Commercial	Recreational	Total
1990	93,888	578,897	672,785	715,902	8,207,515	8,923,417
1991	158,491	798,260	956,751	966,096	10,640,601	11,606,697
1992	256,476	869,779	1,126,255	1,508,064	11,921,967	13,430,031
1993	314,526	789,037	1,103,563	1,800,176	10,163,767	11,963,943
1994	325,401	1,055,523	1,380,924	1,877,197	14,737,911	16,615,108
1995	537,412	2,287,578	2,824,990	3,775,586	27,072,321	30,847,907
1996	854,102	2,487,422	3,341,524	4,822,874	28,625,685	33,448,559
1997	1,076,591	2,774,981	3,851,572	6,078,566	30,616,093	36,694,659
1998	1,215,219	2,915,390	4,130,609	6,552,111	29,603,199	36,155,310
1999	1,223,572	3,123,496	4,347,068	6,474,290	33,564,988	40,039,278
2000	1,216,812	3,802,477	5,019,289	6,719,521	34,050,817	40,770,338
2001	931,412	4,052,474	4,983,886	6,266,769	39,263,154	45,529,923
2002	928,085	4,005,084	4,933,169	6,138,180	41,840,025	47,978,205
2003	854,326	4,781,402	5,635,728	6,750,491	54,091,836	60,842,327
2004	879,768	4,553,027	5,432,795	7,317,897	53,031,074	60,348,971
2005	970,403	4,480,802	5,451,205	7,121,492	57,421,174	64,542,666
2006	1,047,648	4,883,961	5,931,609	6,568,970	50,674,431	57,243,401
2007	1,015,114	3,944,679	4,959,793	7,047,179	42,823,614	49,870,793
2008	1,027,837	4,381,186	5,409,023	7,190,701	56,665,318	63,856,019
2009	1,049,838	4,700,222	5,750,060	7,217,380	54,411,389	61,628,769
2010	1,031,430	5,388,440	6,419,870	6,996,713	61,431,360	68,428,073
2011	944,777	5,006,358	5,951,135	6,789,792	59,592,092	66,381,884
2012	870,684	4,046,299	4,916,983	6,516,761	53,256,619	59,773,380
2013	784,379	5,157,760	5,942,139	5,819,678	65,057,289	70,876,967
2014	750,263	4,033,746	4,784,009	5,937,949	47,948,610	53,886,559
2015	621,952	3,085,725	3,707,677	4,829,997	39,898,799	44,728,796
2016	609,028	3,500,434	4,109,462	4,848,772	43,671,532	48,520,304
2017	592,670	2,937,911	3,530,581	4,816,395	37,952,581	42,768,976
2018	621,123	2,244,765	2,865,888	4,741,342	23,069,028	27,810,370
2019	653,807	2,150,936	2,804,743	4,284,831	23,556,287	27,841,118
2020	577,363	1,709,973	2,287,336	3,560,917	14,858,984	18,419,901

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Table 3. Commercial harvest by region in pounds (x1000), 1995-2020. Source: state compliance reports. ^Estimates exclude inshore harvest.

Year	Ocean								Chesapeake Bay				Grand Total
	MA	RI	NY	DE	MD	VA	NC^	Total	MD	PRFC	VA	Total	
1995	751.5	113.5	500.8	38.5	79.3	46.2	344.6	1,874.3	1,185.0	198.5	517.8	1,901.3	3,775.6
1996	695.9	122.6	504.4	120.5	75.7	165.9	58.2	1,743.2	1,487.7	346.8	1,245.2	3,079.7	4,822.9
1997	784.9	96.5	460.8	166.0	94.0	179.1	463.1	2,244.4	2,119.2	731.9	983.0	3,834.2	6,078.6
1998	810.1	94.7	485.9	163.7	84.6	375.0	273.0	2,287.0	2,426.7	726.2	1,112.2	4,265.1	6,552.1
1999	766.2	119.7	491.8	176.3	62.6	614.8	391.5	2,622.9	2,274.8	653.3	923.4	3,851.4	6,474.3
2000	796.2	111.8	542.7	145.1	149.7	932.7	162.4	2,840.5	2,261.8	666.0	951.2	3,879.0	6,719.5
2001	815.4	129.7	633.1	198.6	113.9	782.4	381.1	3,054.1	1,660.9	658.7	893.1	3,212.6	6,266.8
2002	924.9	129.2	518.6	146.2	93.2	710.2	441.0	2,963.2	1,759.4	521.0	894.4	3,174.9	6,138.2
2003	1,055.5	190.2	753.3	191.2	103.9	166.4	201.2	2,661.7	1,721.8	676.6	1,690.4	4,088.7	6,750.5
2004	1,214.2	215.1	741.7	176.5	134.2	161.3	605.4	3,248.3	1,790.3	772.3	1,507.0	4,069.6	7,317.9
2005	1,102.2	215.6	689.8	174.0	46.9	185.2	604.5	3,018.2	2,008.7	533.6	1,561.0	4,103.3	7,121.5
2006	1,322.3	5.1	688.4	184.2	91.1	195.0	74.2	2,560.2	2,116.3	673.5	1,219.0	4,008.7	6,569.0
2007	1,039.3	240.6	731.5	188.7	96.3	162.3	379.5	2,838.1	2,240.6	599.3	1,369.2	4,209.1	7,047.2
2008	1,160.3	245.9	653.1	188.7	118.0	163.1	288.4	2,817.6	2,208.0	613.8	1,551.3	4,373.1	7,190.7
2009	1,134.3	234.8	789.9	192.3	127.3	140.4	190.0	2,809.0	2,267.3	727.8	1,413.3	4,408.4	7,217.4
2010	1,224.5	248.9	786.8	185.4	44.8	127.8	276.4	2,894.7	2,105.8	683.2	1,313.0	4,102.0	6,996.7
2011	1,163.9	228.2	855.3	188.6	21.4	158.8	246.4	2,862.5	1,955.1	694.2	1,278.1	3,927.3	6,789.8
2012	1,218.5	239.9	683.8	194.3	77.6	170.8	7.3	2,592.0	1,851.4	733.7	1,339.6	3,924.7	6,516.8
2013	1,004.5	231.3	823.8	191.4	93.5	182.4	0.0	2,526.9	1,662.2	623.8	1,006.8	3,292.8	5,819.7
2014	1,138.5	216.9	531.5	167.9	120.9	183.7	0.0	2,359.4	1,805.7	603.4	1,169.4	3,578.5	5,937.9
2015	866.0	188.3	516.3	144.1	34.6	138.1	0.0	1,887.5	1,436.9	538.0	967.6	2,942.5	4,830.0
2016	938.7	174.7	575.0	136.5	19.7	139.2	0.0	1,983.9	1,425.5	537.1	902.3	2,864.9	4,848.8
2017	823.4	175.3	701.2	141.8	80.5	133.9	0.0	2,056.1	1,439.8	492.7	827.8	2,760.3	4,816.4
2018	753.7	176.6	617.2	155.0	79.8	134.2	0.0	1,916.6	1,424.3	449.4	951.0	2,824.7	4,741.3
2019	584.7	144.2	358.9	132.6	82.8	138.0	0.0	1,441.2	1,475.2	417.3	951.1	2,843.6	4,284.8
2020 ⁺	386.9	115.9	473.5	138.0	83.6	77.2	0.0	1,275.1	1,273.8	400.3	611.7	2,285.8	3,560.9

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Table 4. Total removals (harvest plus discards/release mortality) of Atlantic striped bass by sector in numbers of fish, 1990-2020. Note: Harvest is from state compliance reports/MRIP (July 8, 2021), discards/release mortality is from ASMFC. Estimates exclude inshore harvest from North Carolina.

Year	Commercial		Recreational		Total Removals
	Harvest	Discards*	Harvest	Release Mortality	
1990	93,888	47,859	578,897	442,811	1,163,455
1991	158,491	92,480	798,260	715,478	1,764,709
1992	256,476	193,281	869,779	937,611	2,257,147
1993	314,526	115,859	789,037	812,404	2,031,826
1994	325,401	166,105	1,055,523	1,360,872	2,907,900
1995	537,412	188,507	2,287,578	2,010,689	5,024,186
1996	854,102	257,749	2,487,422	2,600,526	6,199,800
1997	1,076,591	325,998	2,774,981	2,969,781	7,147,351
1998	1,215,219	347,343	2,915,390	3,259,133	7,737,085
1999	1,223,572	337,036	3,123,496	3,140,905	7,825,008
2000	1,216,812	209,329	3,802,477	3,044,203	8,272,820
2001	931,412	182,606	4,052,474	2,449,599	7,616,091
2002	928,085	199,770	4,005,084	2,792,200	7,925,139
2003	854,326	131,319	4,781,402	2,848,445	8,615,492
2004	879,768	157,724	4,553,027	3,665,234	9,255,753
2005	970,403	146,126	4,480,802	3,441,928	9,039,259
2006	1,047,648	158,808	4,883,961	4,812,332	10,902,750
2007	1,015,114	160,728	3,944,679	2,944,253	8,064,774
2008	1,027,837	106,791	4,381,186	2,391,200	7,907,013
2009	1,049,838	130,200	4,700,222	1,942,061	7,822,321
2010	1,031,430	134,817	5,388,440	1,760,759	8,315,446
2011	944,777	85,503	5,006,358	1,482,029	7,518,667
2012	870,684	198,911	4,046,299	1,847,880	6,963,774
2013	784,379	114,009	5,157,760	2,393,425	8,449,573
2014	750,263	111,753	4,033,746	2,172,342	7,068,103
2015	621,952	84,463	3,085,725	2,307,133	6,099,273
2016	609,028	88,171	3,500,434	2,981,430	7,179,063
2017	592,670	98,343	2,937,911	3,421,110	7,050,035
2018	621,123	100,646	2,244,765	2,826,667	5,793,201
2019	653,807	84,013	2,150,936	2,589,045	5,477,801
2020	577,363	65,319	1,709,973	2,760,231	5,112,886

* Commercial dead discard estimates are derived via a generalized additive model (GAM), and are therefore re-estimated for the entire time series when a new year of data is added.

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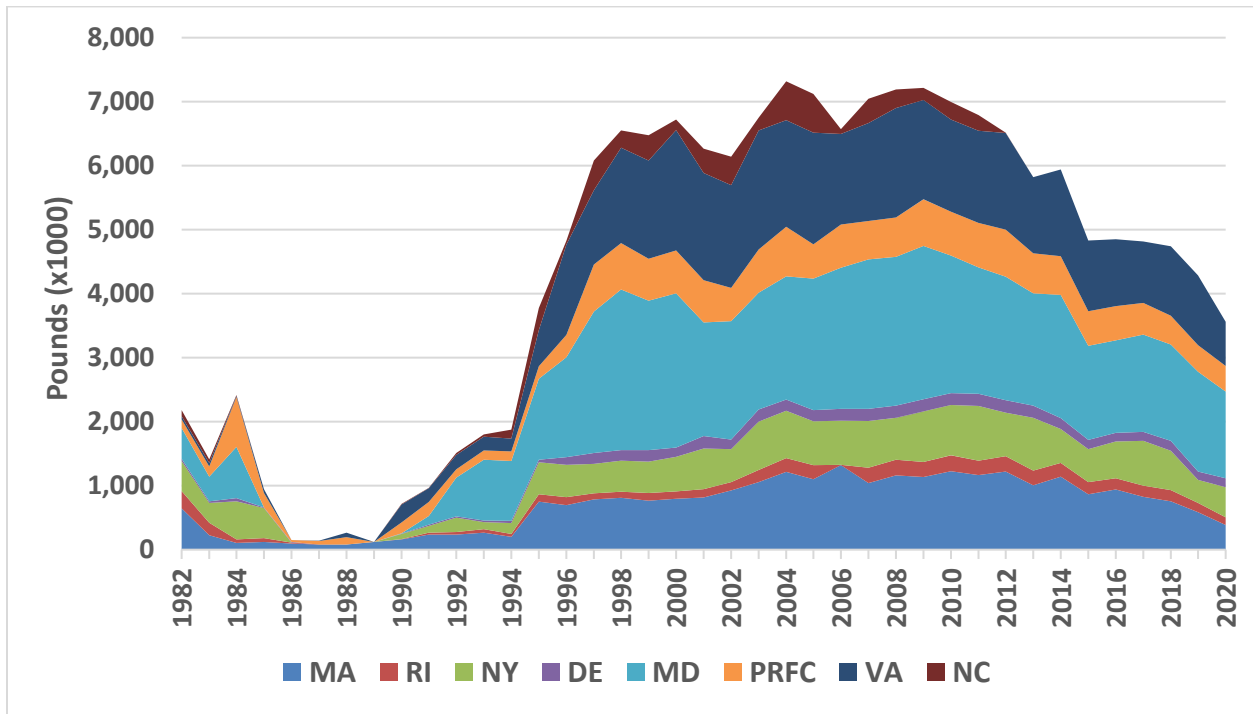
Table 5. Summary of Atlantic striped bass commercial regulations in 2020. Source: 2021 State Compliance Reports. Minimum sizes and slot size limits are in total length (TL). *Commercial quota reallocated to recreational bonus fish program.

STATE	SIZE LIMITS (TL) and TRIP LIMITS	SEASONAL QUOTA	OPEN SEASON
ME	Commercial fishing prohibited		
NH	Commercial fishing prohibited		
MA	≥35" minimum size; no gaffing undersized fish. 15 fish/day with commercial boat permit; 2 fish/day with rod and reel permit.	735,240 lbs. Hook & Line only.	6.24 until quota reached, Mondays and Wednesdays only. (In-season adjustment added Tuesdays effective Sept 1.) July 3rd, July 4th and Labor Day closed. Cape Cod Canal closed to commercial striped bass fishing.
RI	Floating fish trap: 26" minimum size unlimited possession limit until 70% of quota reached, then 500 lbs. per licensee per day	Total: 148,889 lbs., split 39:61 between the trap and general category. Gill netting prohibited.	4.1 – 12.31
	General category (mostly rod & reel): 34" min. 5 fish/vessel/day limit.		5.20-6.30, 7.1-12.31, or until quota reached. Closed Fridays, Saturdays, and Sundays during both seasons.
CT	Commercial fishing prohibited; bonus program in CT suspended indefinitely in 2020.		
NY	26"-38" size; (Hudson River closed to commercial harvest)	640,718 lbs. Pound Nets, Gill Nets (6-8" stretched mesh), Hook & Line.	6.1 – 12.15, or until quota reached. Limited entry permit only.
NJ*	Commercial fishing prohibited; bonus program: 1 fish at 24" to <28" slot size	215,912 lbs.	5.15 – 12.31 (permit required)
PA	Commercial fishing prohibited		

(Table 5 continued – Summary of commercial regulations in 2020).

STATE	SIZE LIMITS (TL) and TRIP LIMITS	SEASONAL QUOTA	OPEN SEASON
DE	Gill Net: 20" min in DE Bay/River during spring season. 28" in all other waters/seasons.	Gillnet: 135,350 lbs. No fixed nets in DE River.	Gillnet: 2.15-5.31 (2.15-3.30 for Nanticoke River) & 11.15-12.31; drift nets only 2.15-28 & 5.1-31; no trip limit.
	Hook and Line: 28" min	Hook and line: 7,124 lbs.	Hook and Line: 4.1–12.31, 200 lbs./day trip limit
MD	Chesapeake Bay and Rivers: 18–36" Common pool trip limits: Hook and Line - 250 lbs./license/week Gill Net - 300 lbs./license/week	1,445,394 lbs. (part of Bay-wide quota) – Initial quota 1,442,120 lbs. – Adjusted quota due to 2019 overage	Bay Pound Net: 6.1-12.31 Bay Haul Seine: 6.1-12.31 Bay Hook & Line: 6.4-12.31 Bay Drift Gill Net: 1.1-2.28, 12.1-12.31
	Ocean: 24" minimum	Ocean: 89,094 lbs.	1.1-5.31, 10.1-12.31
PRFC	18" min all year; 36" max 2.15–3.25	572,861 lbs. (part of Bay-wide quota)	Hook & Line: 1.1-3.25, 6.1-12.31 Pound Net & Other: 2.15-3.25, 6.1-12.15 Gill Net: 1.1-3.25, 11.9-12.31 Misc. Gear: 2.15-3.25, 6.1-12.15
VA	Bay and Rivers: 18" min; 28" max size limit 3.15–6.15	983,393 lbs. (part of Bay-wide quota)	1.16-12.31
	Ocean: 28" min	125,034 lbs.	
NC	Ocean: 28" min	295,495 lbs. (split between gear types).	Seine fishery was not opened Gill net fishery was not opened Trawl fishery was not opened

Figure 1. Commercial Atlantic striped bass landings by state in pounds, 1990-2020. Source: State compliance reports. Commercial harvest and sale prohibited in ME, NH, CT, and NJ. NC is ocean only.





Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • 703.842.0741 (fax) • www.asmf.org

MEMORANDUM

TO: Atlantic Striped Bass Management Board
FROM: Atlantic Striped Bass Plan Development Team
DATE: October 12, 2021
SUBJECT: Draft Addendum VII to Amendment 6

At the direction of the Atlantic Striped Bass Management Board (Board), the Plan Development Team (PDT) drafted an addendum that considers options to allow for the voluntary transfer of the ocean region commercial quota between states that have ocean quota¹. However, the PDT has significant concerns with adding ocean region commercial transfers to the fishery management program at this time. If the Board moves forward with public comment of Draft Addendum VII, it is recommended the below concerns are added to the Draft Addendum. The PDT notes these concerns were previously raised by the Technical Committee (TC) in 2014 when transfers were considered in Draft Addendum IV.

First, the PDT is concerned quota transfer could undermine the goals and objectives of the reductions taken under Addendum VI. The commercial ocean fishery has consistently underutilized quotas, due to a combination of fish availability and state-specific regulations (e.g. commercial prohibitions). Both Addenda IV and VI were designed to achieve a specific reduction in total removals through more restrictive recreational measures and reduced commercial quotas in order to achieve the fishing mortality target. During the Addendum VI process, the TC noted the reduction in commercial quota would achieve the necessary reduction in commercial removals only if the commercial fisheries perform as they have in the past, i.e., if they continue to underutilize their quotas to the same degree. This assumption would be violated if the transfer of commercial ocean region quota is permitted. If Addendum VI commercial quotas were fully utilized by allowing the transfer of latent quota, commercial harvest would be higher than estimated in the Addendum VI projections and states would not maintain the required commercial reduction, thus potentially undermining the goals and objectives of Addendum VI to end overfishing.

Second, a pound of commercial quota is not equal across all states. Through conservation equivalency (CE), states have been able to adjust their commercial size limits, which result in changes to their respective commercial quotas. For example, when implementing Addendum VI, Massachusetts increased its commercial minimum size limit, which increased its quota, and New York lowered its commercial slot limit minimum, which decreased its quota; both of these CE programs are based on a spawner-per-recruit analysis (SPR). Changes in state quota through CE have been occurring since before Addendum VI. Over time several adjustments have been made to commercial size limits resulting in changes to commercial quotas, making transferring quota between states with different size limits difficult. Since the PDT's focus has been on Draft Amendment 7, it has not had the time to consider all of the changes made to base quota allocations that have resulted from adjusting commercial size limits. Given more time, it might be able to address this concern.

¹ The Draft Addendum does not address potential transfers of the Chesapeake Bay quota among the Bay jurisdictions as the FMP does not establish the allocations of the Chesapeake Bay quota, rather Maryland, Virginia, and the Potomac River Fisheries Commission do so per the jurisdictions' mutual agreement. Additionally, the Draft Addendum does not consider allowing transfer of Chesapeake Bay quota to an ocean fishery (or vice versa) due to the distinct management programs between the areas (e.g., size limit differences).



New Hampshire Fish and Game Department

11 Hazen Drive, Concord, NH 03301-6500
Headquarters: (603) 271-3421
Website: www.WildNH.com

TDD Access: Relay NH 1-800-735-2964
Fax: (603) 271-1438
Email: info@wildlife.nh.gov

Scott R. Mason
Executive Director

September 22, 2021

David Borden
Chair, Atlantic Striped Bass Management Board
1050 N. Highland Street
Suite 200 A-N
Arlington, VA 22201

Dear Chair Borden,

During the Atlantic States Marine Fisheries Commission's summer meeting the Striped Bass Management Board met to review the draft Fisheries Management Plan (FMP) Review and state's compliance for fishing year 2020; review the JAI for the Albemarle Sound-Roanoke River striped bass stock; provide guidance to the Plan Development Team (PDT) on the development of Draft Amendment 7; and consider options for addressing commercial quota allocation in a future management document.

In addition to these agenda items, a motion (see below) was presented to initiate an addendum to Amendment 6 to consider allowing the voluntary transfer of commercial striped bass quota between states/jurisdictions that have commercial quota in response to a request from the State of Delaware. The State of Delaware proposed options to address their concerns with the status quo commercial quota allocation (Attachment 1).

Motion:

Move to initiate an addendum to amendment 6 to allow voluntary transfers of commercial striped bass quota as outlined in the memo of July 26th, 2021 to the Atlantic Striped Bass Management Board regarding these transfers.

Motion made by Mr. Clark and second by Mr. Geer. Motion passes (8 in favor, 7 opposed).

Based on the July 26th memo, Commission staff considered workload and indicated "If the Board decides to pursue the proposed option to allow voluntary quota transfers (Option B, sub-option 1)" there could potentially be time to develop a draft addendum to Amendment 6, but not all the options in the memo (e.g., reallocate commercial quotas among states and adjusted quotas).

REGION 1

629B Main Street
Lancaster, NH 03584-3612
(603) 788-3164
FAX (603) 788-4823
email: reg1@wildlife.nh.gov

REGION 2

PO Box 417
New Hampton, NH 03256
(603) 744-5470
FAX (603) 744-6302
email: reg2@wildlife.nh.gov

REGION 3

225 Main Street
Durham, NH 03824-4732
(603) 868-1095
FAX (603) 868-3305
email: reg3@wildlife.nh.gov

REGION 4

15 Ash Brook Court
Keene, NH 03431
(603) 352-9669
FAX (603) 352-8798
email: reg4@wildlife.nh.gov

However, the motion is silent whether both sub-options under Option B (see below) would be considered in the development of this addendum.

Option B: Allow commercial quota transfer.

Sub-option 1: Allow states to voluntarily transfer surplus quota to other states that have commercial quota. Transfers are for one year only.

Sub-option 2: Allow states to voluntarily transfer surplus quota, but only to other states that filled their commercial quota during the previous year. Transfers are for one year only.

Additional aspects in the memo are silent in the motion, such as, recognizing that several states currently implement conservation equivalency programs for their commercial fisheries in order to have management measures to meet the needs of their state's fishery indicating those programs will not be affected. Delaware had also defined the coastal area in the memo "as the entire management unit (i.e., all coastal and estuarine areas of all states and jurisdictions from Maine through North Carolina) excluding the Chesapeake Bay and Albemarle Sound/Roanoke River management areas.

Based on the motion being silent on several aspects outlined in the memo and Delaware's proposed voluntary striped bass commercial quota transfer options, the NH Commissioners have questions to be considered while ASMFC (staff, PDT, etc.) develops the draft addendum to Amendment 6:

- Are both Option B proposed sub-options being considered in this draft addendum?
- How will commercial quota transfers be integrated into state's commercial conservation equivalency programs?
 - For example, how may a state transferring commercial quota that has differing commercial length limits or adjusted target fishing mortality rates than the state receiving commercial quota be reconciled under any approved conservation equivalency programs.
- Will the addendum be inclusive of all coastal and estuarine areas or be excluding the Chesapeake Bay and Albemarle Sound/Roanoke River management areas as Delaware proposed?
- Would there be a limit on the amount of commercial quota a state may receive?
- Would states with no active commercial fishery or have the commercial fishery closed in rule be able to receive quota?
- Would states be able to receive commercial quota and convert this to quota in the recreational fishery?
- If states in the Chesapeake Bay and Albemarle Sound/Roanoke River management areas receive commercial quota would this commercial quota be able to be converted to the recreational fishery?
- Would states in Chesapeake Bay and Albemarle Sound/Roanoke River management areas be able to receive commercial quota from the coastal commercial quota?
- Would transfers be allowed when the stocks are overfished and overfishing is occurring?

- If unused commercial quota was harvested in 2022 what would be the impact to mortality?

Thank you for considering these questions and concerns as the draft addendum to Amendment 6 proceeds. The NH Commissioners request this letter be shared with all Striped Bass Management Board and Advisory Panel members.

Respectfully,



Cheri Patterson
Chief Marine Fisheries



G. Ritchie White
NH Governor Appointee



Dennis Abbott
NH Legislative Proxy

cc: Bob Beal, Toni Kerns, Emilie Franke, ASMFC
Senator David Watters

