

From: [Barry Woods](#)
To: [Comments](#)
Subject: [External] Technical Committee Report of Huge increase in 2022 Harvest of Bass
Date: Thursday, April 27, 2023 9:34:57 PM

Dear members of ASMFC:

I am writing to express my dismay at the Technical Committee's conclusion that the harvest of bass doubled in 2022 at a time when no upcoming year class is in a position to adequately replenish the pipeline.

According to the Technical Committee this reduces the fish's chance of recovery to 14% by 2029 based on the current plan.

This is not acceptable and each you should be concerned about how this reflects on your decisions and management strategy for this fish species.

The measures that need to be taken to compensate for this downward decline must be evenhanded reductions to both commercial and recreational interests, including using the word moratorium if necessary, but measures must be taken now.

I urge you to proceed under the assumption that striped bass are overfished and proceed to reduce harvest quotas immediately.

I live in Maine and find that our fishery has been in decline for a number of years. Now our southern neighboring states will begin to experience what we have been experiencing. For the sake of all member states I urge you to take more affirmative and aggressive action to rebuild. Allowing re-allocation of the commercial quotas between states should be OFF THE TABLE in light of the recent Technical Committee report.

The future of the fishery is on your shoulders. History (and fishermen) are watching.

Sincerely,
Barry Woods



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April 28, 2023

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

Re: ASMFC Spring 2023 Meeting - Atlantic Striped Bass Management

Dear Ms. Franke,

Save The Bay's mission is to protect and improve Narragansett Bay. We support fisheries management policies and regulations that seek to restore and maintain the populations of fish species that provide important ecological functions and support the Bay's ecosystem. This includes the Atlantic Striped Bass. Save The Bay is concerned by the Striped Bass Technical Committee's April 17, 2023 memorandum, which indicates that the probability of rebuilding the stock to the target SSB by 2029 is now only 15%. As such, **we urge the Striped Bass Management Board to immediately initiate a management response (Addendum II)** to allow for appropriate regulations to be in place for the 2024 fishing season.

The Striped Bass Management Board has made commitments to take actions that will help the stock recover by 2029. The Technical Committee's report, which incorporates 2022 Preliminary Removals, shows a disturbing trend in the fishery and indicates that urgent, immediate action is necessary to protect the stock and give the fishery a chance to meet the rebuilding deadline. Data clearly indicates that swift, responsive management measures are needed to protect the Striped Bass spawning stock. The initiation of Addendum II will trigger the necessary research and preparation to give this critically important species an opportunity to rebuild before it is too late.

Thank you for considering our comments.

Sincerely,

Michael Jarbeau
Narragansett Baykeeper
mjarbeau@savebay.org



BACKCOUNTRY HUNTERS AND ANGLERS

NEW ENGLAND CHAPTER
NEW JERSEY CHAPTER
CAPITAL CHAPTER

NEW YORK CHAPTER
NORTH CAROLINA CHAPTER
PENNSYLVANIA CHAPTER

April 27, 2023

Atlantic Striped Bass Management Board
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201
Attn: Emilie Franke, Fishery Management Plan Coordinator
Martin Gary, Chair, ASMFC Striped Bass Board

Re: BHA Comments - ASMFC Striped Bass Board May 2023 Meeting

Backcountry Hunters & Anglers seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. As a component of this mission, BHA supports management policies that ensure abundant populations inhabit our public lands and waters, and are accessible to the hunters and anglers who choose to pursue them.

The Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters & Anglers (collectively, "BHA") submit these comments to make BHA's priorities and desired actions known as they relate to items on the agenda for consideration by the Striped Bass Management Board during the ASMFC's Spring 2023 meeting:

- BHA urges the Striped Bass Management Board to initiate a management action (addendum) in response to the technical committee's projections
- BHA urges the Board to include "Option A" in final action on Addendum I

We will detail our priorities further below:

Management Response (Addendum II)

Under Amendment 6 to the Interstate FMP for Atlantic Striped Bass the timeline required to recover the Striped Bass fishery to *target* in response to a SSB management trigger was 10 years. During the development of Amendment 7 there was discussion, both amongst the Board and in public testimony, related to modifying both the recovery timeline and the biomass reference points that affect the definition of recovery (i.e. SSB target). Ultimately, the Board decided to uphold both the recovery timeline and existing reference points, knowing at that time that a management trigger had been tripped and that the stock needed to be recovered to *target* SSB by

2029. Of relevance, Amendment 7 also included provisions related to prompt management action to rebuild the stock, stating specifically in Section 4.4.2 that:

“If the 2022 stock assessment results indicate the Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 (as calculated using the low recruitment assumption) and if the stock assessment indicates at least a 5% reduction in removals is needed to achieve F rebuild, the Board may adjust measures to achieve F rebuild via Board action (change management measures by voting to pass a motion at a Board meeting).”

Ultimately, the 2022 stock assessment (which only included data up through the 2021 fishing season) did not indicate that management changes were needed at that time, so no action was taken pursuant to section 4.4.2. The Board did, however, request that the Technical Committee provide a report during the May 2023 meeting outlining the impact of the 2022 fishing season data so that action could be taken in advance of the 2024 season if needed.

The projections prepared by the technical committee in response to the Board’s request are included in the April 17, 2023 memorandum, and clearly demonstrate the need for responsive management action. While the 2022 Stock Assessment Update (which included data through the 2021 fishing season) projected an acceptable 78% chance of recovering SSB to *target* by 2029, the addition of 2022 fishing mortality data reduces the odds of recovery by 2029 to an unacceptable 15%. While the odds of ending overfishing (SSB exceeds *threshold*) by 2029 remain quite good, that is not the requirement for recovering the Striped Bass stock.

When the Board enacted Amendment 7 in 2022 it made a commitment to the public that everything possible would be done to recover the Striped Bass stock by 2029. The Board also acknowledged that responsive management actions might be needed, and that rapid response was the best course of action. The data now clearly indicates that current management measures are *not* sufficient to fulfill the Board’s obligation of recovering SSB to target by 2029, **and we urge the Board to initiate responsive management action immediately**, so that necessary changes might be implemented for the 2024 fishing season.

Addendum I

In correspondence related to the public input process for Addendum I to Amendment 7 BHA urged the Board to **support Option A**, which would effectively prohibit the interstate transfer of ocean commercial quota by maintaining the status-quo policy. In urging support for Option A we provided the rationale that facilitating additional fishing mortality would detract from current and future recovery efforts and general conservation of the species, and this would not align with BHA’s mission and priorities.

Since the Board decided to seek additional data rather than taking final action on Addendum I during its January 2023 meeting the rationale supporting Option A has only been reinforced. While the current management regime projects a disappointing 15% chance of recovering the Striped Bass stock by 2029, the addition of quota transfers further reduces that projection to 11%.

As we noted in our public comments on Addendum I, even those options that restrict transfers based on stock status would facilitate additional fishing mortality during periods when SSB exceeds threshold (i.e. is not overfished), but has not yet been reached target (i.e. is not yet recovered), essentially hampering recovery efforts at the time that they are on the verge of being successful.

Given that the data supporting the need to initiate responsive management actions so the fishery is recovered by 2029 is now clear, it would be counterintuitive for the Board to take action that would facilitate additional fishing mortality, which all options on the table aside from the status quo clearly do. As a result, we re-iterate our priority from earlier this year, and urge the Board to **include Option A** in the final action on Addendum I.

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

Sincerely,

Michael Woods



Chair, New England Chapter Board
Backcountry Hunters and Anglers

And the undersigned Chapter Leadership Boards:

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(Connecticut, Maine, Massachusetts,
New Hampshire, Rhode Island, Vermont)
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New Jersey Chapter Board
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Saving a National Treasure

April 27, 2023

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

RE: Comments on Revised Recreational Projections

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 to the Atlantic Striped Bass Management Board (the Board) on the Atlantic States Marine Fisheries Commission's (ASMFC) Technical Committee (TC) Memorandum titled, "Rebuilding Projections with 2022 Preliminary Data and Ocean Quota Utilization Scenarios." CBF is the largest conservation organization dedicated solely to saving 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 forests, wetlands, and underwater grasses. CBF represents more than 300,000 members who support the wise management of the region's living resources with a long-term interest in striped bass.

Earlier this year, CBF released its 2022 *State of the Bay Report* which, since its inception, has included striped bass as an indicator species used to help judge the overall health of Chesapeake Bay. In this report, we noted that although conservation measures have reduced striped bass mortality to appropriate levels, the population is considered depleted and Chesapeake Bay recruitment has been considered average at best. The new projections contained in the TC Memorandum, however, are a clear indication that fishing effort has significantly increased. Action is urgently needed to reduce fishing mortality to ensure stock rebuilding meets the current rebuilding timeframe.

The Memorandum shows a very concerning downward probability of meeting the target population by 2029. Although probabilities of reaching the population threshold are listed as being very high, the goals and objectives of the Interstate Fisheries Management Program (ISFMP) for Atlantic striped bass require the Board to rebuild this population to its target and not settle for biomass somewhere above the threshold.

CBF is especially concerned about this new data given the significant headwinds the population is facing from climate change in the Chesapeake Bay region. Recent poor levels of recruitment have been noted, especially in Maryland. Poor spawning conditions have tended to coincide with warm, dry springs here in the region. Unfortunately, such conditions have been persistent throughout the region. This is in addition to recently released studies that indicate that the amount of suitable habitat for striped bass in the Chesapeake Bay region has been steadily decreasing since the mid-1990s. Impacts of invasive species, including blue catfish and Northern snakeheads, on striped bass larvae and juveniles, are likely exacerbating these environmental challenges.

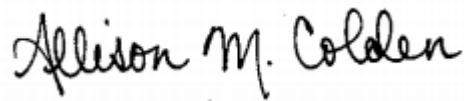
Like many species, striped bass populations are moving northward as waters warm. ASMFC has seen ample evidence of this as North Carolina has not reported any ocean harvest since 2012 and the state recently reduced harvest in the Albemarle Sound and Roanoke River management areas. In Chesapeake Bay, low recruitment numbers have led ASMFC to use a low recruitment scenario for management decisions moving forward. Historically, above average recruitment conditions for striped bass have coincided with cooler water conditions and ample rainfall.

CBF urges the Board to consider initiating action at this meeting to reduce mortality back to sustainable levels and get the restoration of this iconic Chesapeake Bay species back on track.

Sincerely,



Chris Moore
Senior Regional Ecosystem Scientist



Allison M. Colden, Ph.D.
Maryland Executive Director

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