



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Atlantic Striped Bass Management Board

FROM: Emilie Franke, FMP Coordinator

DATE: April 25, 2023

SUBJECT: Conservation Equivalency and Reduction Considerations for Management Actions under Amendment 7

At the upcoming 2023 Spring Meeting, the Atlantic Striped Bass Management Board (Board) may consider potential management action in response to the Technical Committee (TC) projections incorporating preliminary 2022 removals. This memorandum reviews the conservation equivalency (CE) and reduction considerations if a management action is initiated by the Board.

Atlantic striped bass are managed under Amendment 7 to the Interstate Fishery Management Plan (FMP). Amendment 7 maintains the same commercial quotas (18% reduction from Add IV) and the same recreational size/bag limits (1 fish at 28-<35" for ocean; 1 fish at 18" min. for Bay) as Addendum VI, which were designed to achieve an 18% reduction from 2017 levels. As such, all approved Addendum VI conservation equivalency programs are maintained until such measures are changed. Approved Addendum VI CE programs are summarized in the enclosed table. Current CE programs include seasonal closures in some Chesapeake Bay jurisdictions, and some states took a less than 18% reduction in commercial quotas offset by a greater than 18% reduction by the recreational sector.

CE Stock Status Restriction

If the Board initiates a new action (e.g., addendum) to change management measures, that action will be subject to the Amendment 7 CE stock status restriction since the stock is currently overfished. When the stock is overfished, CE programs will not be approved for non-quota managed recreational fisheries, with the exception of the Hudson River, Delaware River, and Delaware Bay recreational fisheries.

This means that most recreational fisheries cannot deviate from the new FMP standards that would be specified in a new addendum. For example, if a new addendum specifies an FMP standard of specific season dates for the entire Chesapeake Bay, then all Chesapeake Bay states must implement those season dates. If a new addendum specifies an FMP standard of state-specific seasons, then state-specific seasons could be implemented.

Through a new addendum, the Board could choose to change some measures while maintaining other existing measures. For example, an addendum could specify a new FMP

standard size/bag limit for the ocean and new size/bag limit for the Chesapeake Bay, while also specifying the FMP standard season as maintaining current state-specific seasons.

The only non-quota managed recreational fisheries that could deviate from new FMP standards through CE are Hudson River, Delaware River, and Delaware Bay recreational fisheries. Or, the Board could choose to specify FMP standards for those fisheries in the addendum.

As a reminder, the Chesapeake Bay spring trophy fishery is part of the ocean fishery for management purposes, and so will be subject to the same requirements as the ocean recreational fishery in any new action, unless that action establishes specific trophy fishery measures.

Board Guidance on Reduction Measures

If the Board initiates a management action to achieve a percent reduction, the TC would need guidance on what types of measures should be considered. In August 2022, the Board had a hypothetical discussion about what types of measures to consider in the event the 2022 Stock Assessment Update indicated a reduction was needed to rebuild the stock. Although a reduction was not indicated from the 2022 Assessment Update, the Board prepared for that possible outcome by addressing the following questions at the August 2022 Board meeting:

- How should the reduction be split between the commercial and recreational sectors? Should both sectors take the same percent reduction, or should one sector take a higher or lower percent reduction?
 - Board discussion from August 2022: requested options for both (1) an equal percent reduction for both sectors and (2) a different percent reduction for each sector weighted based on proportion of total removals.
- What recreational measures should be considered? If considering seasonal closures, would the Board prefer a consistent coastwide closure or flexibility for states to choose closure dates (e.g., within a particular wave)?
 - Board discussion from August 2022 for Ocean: requested options for the ocean that would either shrink or shift the current ocean slot limit. Seasonal closure options for the ocean could be considered if adjusting the slot limit does not achieve the reduction; any ocean seasonal closure options would be no-harvest closures with flexibility for states to select closure dates.
 - Board discussion from August 2022 for Chesapeake Bay: requested options for a Baywide slot limit or maximum size limit (e.g., 36" maximum), as well as options for seasonal closures, including Bay state-specific seasonal closure options.

Moving Forward from Current Measures

In August 2022, the Board also discussed the TC recommendation regarding how to move forward from current Addendum VI CE programs. The TC noted that while it would be possible to calculate a potential reduction under the assumption that all states implemented the Addendum VI FMP standard (instead of their CE programs), it would add additional uncertainty

by trying to predict what removals would have been under different regulations. Therefore, the TC recommended using the current set of management measures and resulting level of removals (now looking at 2022 removals) as the starting point for calculating the potential reduction. In other words, what new set of management measures would achieve the rebuilding reduction relative to the 2021/2022 commercial quotas and 2021/2022 recreational size limits/bag limits/seasons?

At the August 2022 meeting, the Board supported the TC's recommendation to use the current set of management measures and resulting level of removals as the starting point for calculating the potential reduction. The TC would develop a new set of management measures designed to achieve the reduction relative to the 2021/2022 commercial quotas and 2021/2022 recreational size limits/bag limits/seasons.

Again, through a new action, the Board could choose to change some measures while maintaining other existing measures (e.g., change the size/bag limits but maintain 2022 seasons).

The TC memo from August 2022 (Memo 22-77) is available here:

http://www.asmfc.org/uploads/file/63cb1abeSBTCreport_PotentialReductionMemo_07.2022.pdf

The full summary of August 2022 Board discussion is available here:

<https://asmfc.org/files/Meetings/2022SummerMeeting/2022SummerMeetingSummary.pdf>

Table. CE programs implemented for Addendum VI

State	Recreational Fisheries	Commercial Fisheries
MA	N/A	Changed size limit (35" minimum) with equivalent quota change
NY	Hudson River: Alternative size limit (18" to 28") to achieve 18% removals reduction in combination with standard Ocean slot	Changed size limit (26" to 38") with equivalent quota reduction
NJ	Alternative size limit (28 to < 38") to achieve 25% removals reduction	Decreased commercial quota reduction (to 0%) with surplus recreational fishery reduction and transferred commercial quota to recreational bonus program fishery (24 to < 28", 1 fish/day)
PA	DE River and Estuary downstream Calhoun St Bridge: Alternative size and bag limit on limited seasonal basis (2 fish/day at 21 to <24" during 4.1–5.31) to achieve 18% removals reduction	N/A
DE	DE River/Bay/tributaries: Alternative slot on limited seasonal basis (20" to <25" during 7.1–8.31) to achieve 20.4% removals reduction in combination with standard Ocean slot	Decreased commercial quota reduction (to -1.8%) with surplus recreational fishery reduction
MD	Chesapeake Bay: Alternative Summer/Fall for-hire bag limit with restrictions (2 fish, only 1 >28", no captain retention) through increased minimum size (19"), April and two-week Wave 4 targeting closures, and shorter spring trophy season (May 1–15) to achieve 20.6% removals reduction; Ocean: FMP standard slot	Decreased Ocean and Chesapeake Bay commercial quota reduction (to -1.8%) with surplus Chesapeake Bay recreational fishery reduction
PRFC	Alternative Summer/Fall minimum size and bag limit (20" min, 2 fish/day) with a no targeting closure (7.7–8.20) and shorter spring trophy season (May 1–15) to achieve a 20.5% removals reduction	Decreased Chesapeake Bay commercial quota (to -1.8%) with surplus recreational fishery reduction
VA	Chesapeake Bay: Alternative slot limits during 5.16–6.15 (20" to 28") and 10.4–12.31 (20" to 36") and no spring trophy season to achieve a 23.4% removals reduction (reduction was the result of lowering prior bag limit from 2 to 1-fish per angler); Ocean: Alternative slot limit (28" to 36")	Decreased Ocean commercial quota (to -7.7%) and Chesapeake Bay commercial quota (to -9.8%) with surplus recreational fishery reduction



R.I. Party and Charter Boat Association
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Capt. Rick Bellavance
Capt. Steve Anderson
Capt. Andrew D'Angelo
Capt. John Rainone
Capt. Nick Butziger

March 17, 2023

Mr. Marty Gary, Chair
Atlantic Striped Bass Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

RE: Possible Management response to March TC/SAS report

Mr. Gary,

The Rhode Island Party and Charter Boat Association (RIPCBA) is comprised of 58 charter/party boat owners that operate small businesses from ports in the State of Rhode Island. Without question, the harvest of Striped Bass is of significant importance to nearly all of our members. We would like to offer a few thoughts as the Striped Bass Management Board (Board) considers a management response to the recent Technical Committee and Stock Assessment Subcommittee's (TC/SAS) tasking report.

We are not surprised by the 40% increase in recreational removals in 2022. Reports from nearly every part of the coast were strong in 2022. It is worth noting that coastwide Charter/Party mode catch increased by less than 2% in 2022 compared to 2021 according to MRIP.

We consider the Striped Bass fishery to be conservatively managed with positive results over time. As the Board considers if it should wait for the next assessment or develop a management response for 2024, we ask that consideration be given to the importance of harvest of striped bass to the charter/party mode. Like other areas and charter/party associations, we have members that have built a business around catch and release, but the majority of our members support clients who desire harvesting Striped Bass for food. Nearly all of the recent management approaches to reducing mortality have impacted those charter/party clients who seek Striped Bass to eat. We consider this inequitable because management measures only impact those clients. If the Board does decide to respond to the higher 2022 catch, we encourage the Board to consider the very real economic impacts that will be assumed by the charter/party fleet. We recommend the board analyze catch by different recreational modes over time to see if there is a relationship between recent management measures and effects on different modes catch. Many fishery management plans and states partners recognize that recreational modes do not function with the same goals and objectives and have looked to mode specific measures to create equity within the recreational fishery, recognize the important economic contributions of the charter/party fleet, and achieve the FMP's goals and objectives. As example: Bluefish, Black Sea Bass, Scup, Tautog, GOM Haddock, and Bluefin Tuna all have mode specific measures. Maybe the Board could explore mode specific measures for this FMP.

We are also thinking about how we could observe such a strong Striped Bass fishery over time, given the less than stellar Chesapeake Bay/Maryland YOY results in several years. We believe the noticeably strong arrival of early season striped bass in Southern New England followed by weaker showings in late July and August could match up with average to below average Chesapeake Bay spawning success, but also indicate better performance from more northern spawning areas like the Hudson River. In our experience, the first Striped Bass to arrive in our areas are not Chesapeake Bay fish, but from more northern wintering locations. Chesapeake Bay fish show up in Southern New England later in the season. We think this could be considered as the Board considers how much risk to take until the next assessment is complete. Weakness in the Chesapeake, complemented by strength in other places, could explain our current healthy observations and provide rationale for a bit of risk tolerance by the Board until the next assessment.

The RIPCBA recognizes the importance of good Striped Bass management and we appreciate the opportunity to offer a few comments as the Board deliberates what to do in light of higher 2022 recreational catch. We ask that consideration be given to the impacts the Boards decisions will have on businesses like ours and our clients that like to eat Striped Bass.

Respectfully Submitted,

Capt. Rick Bellavance

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



President Capt. Marc Berger, Vice-Pres. Seth Megarle, Treasurer Capt. TJ Karbowski, Secretary Capt. Mike Pirri

Mr. Marty Gary, Chair
Atlantic Striped Bass Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
RE: Possible Management response to March TC/SAS report

Mr. Gary,

The Connecticut Charter and Party Boat Association is comprised of 40 professional charter boats sailing from ten different Connecticut ports, covering the Western, Central and Eastern Long Island Sound. Our Professional Captains have verified credentials, are held to the highest ethics standards and are out on the water everyday often acting as the sheppard's of their areas.

We are not surprised by an increase in recreational removals in 2022. Reports from nearly every part of the coast were strong in 2022. It is worth noting that coastwide Charter/Party mode catch increased by less than 2% in 2022 compared to 2021 according to MRIP. If you predate the rebuild to the first emergency action: the cut from 2 fish to 1 per angler, we are 8 years into a rebuild effort. Why wouldn't you see an increase in (built back) harvest in year 8. Perhaps prior stock assessments mislead/ under reported the spawning stock biomass. It's very costly to bet on uncertainty, any added reductions on Striped Bass regulations will put nearly all for hire boats from Maine to the Carolinas out of business. The economic impact will crimp all recreational fishing opportunities and result in over a billion dollar loss every year.

Striped bass stock assessment narrows reproduction to just two locations Hudson river and the Chesapeake bay. Sexually mature Striped Bass winter over and reproduce in all Connecticut rivers and many northern rivers thru Massachusetts too. So the stock is supported by these rivers when poor Chesapeake reproductive years occur. Its very frustrating that Striped Bass spawning in the Chesapeake area must compete against omega protein for their food. And now this year Omega Protein is issued a 20% larger quota. Maybe the effort should be put on protecting forage for the Striped Bass instead of putting so many small businesses out of work.

Sincerely the Officers of the CCPBA
Capt. Marc Berger
Capt. Seth Megarle
Capt. TJ Karbowski
Capt. Michael Pirri



2023 Spring Meeting - Act Now!

Stripers Forever
57 Boston Rd
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stripers@stripersforever.org

April 25, 2023

Emilie Franke
FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, Virginia 22201

Ms. Franke & the ASMFC Striped Bass Management Board,

I am writing you today on behalf of thousands of our concerned members. The technical committee meeting on March 30, 2023 brought to light some very alarming data. With a significant rise in harvest during 2022, estimated to be more than double that of the previous year, the probability of rebuilding by 2029 has decreased by 83-86%. We are now looking at a 14.6% probability of rebuilding, even less if Addendum 1 (commercial quota transfers) is approved.

We have reached a defining moment in the recovery of the striped bass stock. The board can choose to either act now or delay action and derail the rebuilding timeline. Choosing the latter would clearly violate the requirements within Amendment 7. The board needs to stick to the 10-year rebuilding schedule with a minimum 50% chance of success.

Four straight years of poor recruitment in the Chesapeake combined with a massive increase in harvest has left us in a horrible position. We are removing more fish from the population than are entering it, many of whom are larger spawning fish, it is simply not sustainable. We suggested a harvest moratorium and seasonal closures during the public comment period leading up to Amendment 7. Neither was put in place and here we are again, trying to correct a management plan which to this point has failed.

Stripers Forever and our members ask that the board act swiftly in removing Addendum 1 from consideration on May 2nd. Instead, initiate an Addendum which would greatly reduce harvest and make certain that the stock successfully rebuilds by 2029.

Task the technical committee with developing options to adjust the current management plan. And hopefully, when the time comes, we urge the board to consider seasonal closures (specifically in and around spawning areas) as well as a coastwide commercial and recreational harvest moratorium. There is no time to waste, even the slightest delay will have a grave effect on rebuilding the stock.

Sincerely,



Taylor Vavra
Vice President
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(914) 522-9507



Emilie Franke
FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street Suite 200
Arlington, Virginia 22201

4/17/23

RE: Initiating an Addendum to Ensure the Striped Bass Stock Successfully Rebuilds by 2029

Dear Ms. Franke,

The American Saltwater Guides Association (ASGA) is a coalition of fishing guides, fishing related businesses, and conservation minded private anglers. Our members on the Atlantic coast are reliant on a healthy population of striped bass. ASGA has engaged on every striped bass management issue in a meaningful and productive manner since our inception. Today, we believe that the striped bass fishery is at an inflection point: if action is not taken at the upcoming May meeting, the stock will not rebuild by 2029 and drastic measures may become warranted.

It is clear that some areas experienced excellent striped bass fishing last year. The good fishing translated into over 35 million pounds of striped bass harvested coastwide¹. ASGA had deep concerns that the slot limit would fully exploit the robust 2015-year class. These concerns are now a reality. The 2015-year class is the last robust recruitment year. While the 2017 and 2018-year classes are average, there are four consecutive years of the lowest recruitment in recent history following. This leaves the stock and those that depend on a healthy striped bass population in a very dangerous place.

Amendment 7, which was just approved and implemented in May 2022, clearly states that the stock must be rebuilt within 10 years (Striped bass was declared overfished in 2019 thus the rebuilding deadline is 2029).²

2.7.2 Stock Rebuilding Schedules

If at any time the Atlantic striped bass population is declared overfished and rebuilding needs to occur (as specified in Section 4.1 Management Triggers), the Board will determine the rebuilding schedule at that time. The only limitation imposed under Amendment 7 is that the rebuilding schedule is not to exceed 10 years.

The current rebuilding plan has failed. The 2022 MRIP harvest numbers showed that harvest doubled and decreased the probability of rebuilding to 14%. The probability is considerably lower if commercial transfers are approved as per the Technical Committee meeting on March 30th. This is unacceptable to our community and clearly violates Amendment 7's rebuilding provisions. Taking a correction now is far better than draconian measures in a few years.

¹ Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division April 12, 2023.

² Atlantic States Marine Fisheries Commission. Amendment 7 to the Interstate Fisheries Management Plan for Atlantic Striped Bass. May 2022. https://asmfc.org/uploads/file/63cb1c52AtlStripedBassAm7_May2022.pdf

Delaying action in May would represent a complete failure of the Striped Bass Management Board to address known issues with the striped bass rebuilding plan.

We are asking only that the Striped Bass Management Board follow the rules it established. A new rebuilding plan that has a minimum of a 50% chance of success must be initiated, and those regulations need to be in place by the 2024 season.

ASGA and the undersigned anglers, fishing guides, and businesses are calling on the Striped Bass Management Board to initiate Addendum II to Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass, ensuring the striped bass stock successfully rebuilds by 2029.

Sincerely,



Tony Friedrich
Vice President and Policy Director
tony@saltwaterguidesassociation.org
(202) 744-5013

CC: Bob Beal, ASMFC Executive Director
Martin Gary, Striped Bass Management Board Chair

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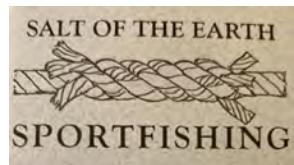
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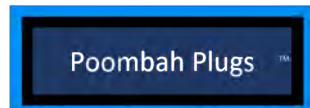
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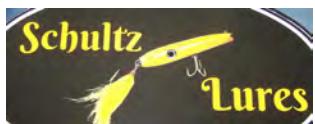
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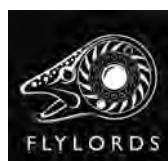
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Thirst Productions, LLC
Sunset Surfcasting
North Fork Anglers Fishing Club
SaltwaterFlies.com
JLS Light Tackle Guide Service
Current Culture Fly Shop
Endurance Charters
Cortes Outfitters, LLC
Walshe Associates
Fierston Fishing Team
Fishin' Physicians
Sweetgrass Rods
Fishing Guide University
Critter Catcher Fishing
AB Marine
Long Cast Plastics
Advanced Fishing USA
Sweetgrass Rods
Wally's Lures & Tackle
Belfer Lighting
JW Brooks International
Timber Flats Outfitters

Ragged Mountain Resort
Vacationland Bait & Tackle
Jay D. Gemma and Associates
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