



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Atlantic Striped Bass Management Board
FROM: Emilie Franke, FMP Coordinator
DATE: December 13, 2024
SUBJECT: Public Comment Summary for Draft Addendum II

The following is an overview of all comments received by ASMFC for the December 2024 Atlantic Striped Bass Board Meeting as of December 10, 2024 (closing deadline).

A total of 4,360 [written comments](#) were received from individual comments, organizations, and form letters. A total of 40 organizations submitted written comments; one organization's letter also listed 1,723 supporting signatories. A total of 976 comments were received through four form letters. The remainder of comments (1,621) came from individual comments including from private anglers, charter captains, commercial fishermen, and concerned citizens.

The following pages include comment tallies for the four primary questions the Board will consider at the December 2024 Board meeting. Some comments addressed all four questions directly, some comments addressed one or two issues, and some comments addressed other striped bass management topics.

Total Comments Received

Number of written comments received by individuals, form letters, and organizations.

Written Public Comments Received	
Individual Comments	1,621
Form Letters [^]	976
Organizations	40
Organization Signatories	1,723
TOTAL	4,360

[^] 4 different form letters received.

What level of reduction should the Board implement in 2025, if any?

	Support Reduction/ Taking Action	Maintain Status Quo/ Action Not Needed
Individual	414	223
Form Letter	699	277
Organization	17	17
Signatories	1,723	
Written Total	2,853	517

Comments tallied for this question were comments that explicitly indicated support for taking a reduction in 2025 (e.g., take action to rebuild the stock, change measures to address stock decline, etc.), or comments explicitly opposed to taking action at this time (i.e., maintaining the status quo, no need to change management). Comments noting which management measures were preferred *if* the Board were to take action, or comments noting opposition to specific management measures or noting certain measures were tolerable, were **not** tallied for this question because it was unclear whether those commenters supported/opposed taking a reduction in 2025. Due to this, it is possible tallies could be an underestimate.

Comments that explicitly supported taking action noted the need to act urgently to rebuild the stock by 2029, especially considering recent low recruitment. Commenters noted concern that if a reduction was not taken now, more drastic action could be necessary in the coming years. Commenters noted the need to be risk-averse given the uncertainty in stock projections.

Comments supporting overall status quo noted the current management measures, specifically the narrower slot, are working to rebuild the stock and more time is needed to see the results of those measures. Commenters noted the stock projections indicate the stock will be close to reaching its rebuilding goal with no action, and further restrictions would have negative economic consequences on top of the current restrictive measures. Commenters noted that taking another reduction would not address the underlying environmental factors contributing to poor recruitment.

For any reduction, how should the reduction be split between the recreational and commercial sectors?

	Both Sectors Take a Reduction*	No Reduction for Commercial
Individual	292	3
Form Letter	699	
Organization	12	2
Signatories	1,723	
Written Total	2,726	5

*Most comments supporting both sectors taking even reductions (same percent reduction for each sector). A small number of comments supported each sector taking a reduction based on its contribution to total removals (e.g., commercial 1.5% and recreational 16%).

Comments in support of both sectors taking a reduction noted all sectors should share the burden of any reduction to rebuild the stock. Some comments noted any commercial reductions should be taken from harvest, not the quota.

Comments supporting no reduction for the commercial sector noted another cut to commercial quotas would not be economically sustainable, and that the commercial sector is managed by a hard quota and the recreational fishery is not.

For recreational measures, should the Board change size limits?

	Support Changing the Size Limit
Individual	321
Form Letter	
Organizations	6
Signatories	1,723
Written Total	2,050

Comments in support of changing the size limit provided a wide range of recommendations. Some comments support lowering the slot limit to include sizes below 28" to protect the 2015 and 2018 year-classes. On the other hand, some comments noted strong opposition to going below 28" due to the risk of targeting immature fish that have not yet spawned. Some comments recommended narrowing the current slot (e.g., 28-30") or implementing a high minimum size limit to protect the 2018 year-class (e.g., 36" or 40" minimum). Other size limit recommendations included expanding the slot limit or returning to a 28" minimum to reduce releases.

For recreational seasonal closures, should the Board implement no-harvest closures or no-targeting closures?

	Support		Oppose	
	Support No-Harvest Closure Options	Support No-Targeting Closure Options	Oppose Both No-Harvest and No-Targeting Closure Options/ General Opposition to Any Closure	Opposes Only No-Targeting Closures
Individual	410	44	236	630
Form Letter		699 <i>[all specific to Chesapeake Bay]</i>	277	
Organization	11	3 <i>[1 of those specific to Chesapeake Bay]</i>	16	10
Signatories			1,723	
Written Total	421	746 <i>[700 of those specific to Chesapeake Bay]</i>	2,252	640

Many comments noted opposition to both the no-harvest and no-targeting options in the Technical Committee Report, and many additional commenters noted opposition to only no-targeting closures. Commenters noted there would be severe economic consequences if no-targeting closures were implemented that would impact all parts of local fishing economies (charter boats, tackle shops, businesses related to fishing tourism, etc.). Commenters noted that prohibiting fishing is a drastic, unnecessary measure that would devastate the fishing industry. Commenters also noted no-targeting closures are unenforceable.

Some commenters noted similar economic concerns about no-harvest closures as well, and additionally noted that no-harvest closures unfairly impact those who prefer to harvest striped bass. Some commenters noted they oppose the no-harvest closure options as presented in the Technical Committee Report, but could support no-harvest closures in the future if options were more equitable to ensure states with shorter fishing seasons are not disproportionately impacted and to ensure states/regions are taking equitable reductions. Some comments also noted concern about the proposed regional breakdowns for seasonal closures. Some regions are too large with very different fisheries, so certain states in a region would be more impacted than other states in a region depending on when the closure occurs.

There were many comments specifically opposing closures in New Jersey during October, November, and December. Commenters noted this is the peak fishing season and closures would have devastating economic impacts. There were also comments noting that if closures had to be implemented, the closures should occur during the spring spawning season.

Those in support of no-harvest closures noted closures would be an effective tool reduce fishing mortality while preserving the ability to fish catch-and-release.

Some comments in support of no-targeting closures were specific to no-targeting closures in the Chesapeake Bay when the release mortality rates are high. Other comments in support of no-targeting closures noted that if closures had to be implemented, no-targeting closures would be the only fair way to address removals from those that harvest striped bass and the catch-and-release fishery.

Common Additional Topics Raised in Comments

Commenters raised several additional topics on striped bass management. Common topics included, in no particular order:

- Support for a harvest moratorium, either temporarily until the stock recovers or permanently (catch-and-release only fishery/gamefish status).
- Support for eliminating commercial harvest and concern that the commercial fishery is hindering stock recovery.
- Need to better understand the cause of low recruitment and recognize the impacts of environmental factors on the stock (e.g., water quality, predation, climate change, etc.).
- Support for additional recreational gear restrictions (e.g., ban treble hooks, require barbless hooks).
- Need to increase angler education on best handling practices.
- Need for increased enforcement, as well as increased fines, and concerns about poaching.
- Support for managing the for-hire mode separately from the rest of the recreational sector.
- Need to address menhaden harvest in the Chesapeake Bay and other areas.