

# **Atlantic States Marine Fisheries Commission**

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#### **MEMORANDUM**

TO: Atlantic Striped Bass Management Board

FROM: Atlantic Striped Bass Advisory Panel

**DATE:** October 21, 2025

SUBJECT: Advisory Panel Recommendations on Draft Addendum III Options

The Atlantic Striped Bass Advisory Panel (AP) met via webinar on October 9 and October 16, 2025 to discuss AP recommendations on proposed options in Atlantic Striped Bass Draft Addendum III to Amendment 7. ASMFC staff provided the AP with an overview of the proposed options and a summary of public hearing comments. The following is a summary of AP members' recommended options and rationale discussed during the two webinars.

Four AP members submitted comments via email which are enclosed after the summary.

#### October 9 AP Members in Attendance

Eleanor Bochenek (AP Chair, NJ rec., fisheries

scientist)

Peter Whelan (AP Vice Chair, NH recreational)

Peter Fallon (ME for-hire)

Patrick Paquette (MA recreational)

Craig Poosikian (MA commercial)

Andy Dangelo (RI for-hire)

Peter Jenkins (RI recreational/tackle shop)

Kyle Douton (CT recreational/tackle shop)

Julie Evans (NY for-hire, commercial)

Tom Fote (NJ recreational)

Leonard Voss (DE commercial)

Charles (Eddie) Green (MD for-hire/rec)

Will Poston (DC recreational)

Bill Hall (VA recreational)

Kelly Place (VA commercial)

Jon Worthington (NC commercial)

#### October 16 AP Members in Attendance

Eleanor Bochenek (AP Chair, NJ rec., fisheries

scientist)

Peter Whelan (AP Vice Chair, NH recreational)

Peter Fallon (ME for-hire)

Craig Poosikian (MA commercial)

Andy Dangelo (RI for-hire)

Julie Evans (NY for-hire, commercial)

Tom Fote (NJ recreational)

Charles (Eddie) Green (MD for-hire/rec)

Will Poston (DC recreational)

Bill Hall (VA recreational)

Kelly Place (VA commercial)

ASMFC Staff: Emilie Franke

There were 14 public attendees.

#### Section 3.1: Method to Measure Total Length of a Striped Bass

This topic was discussed on the October 16<sup>th</sup> AP webinar.

6 AP members on the webinar support Option B. standard definition of total length noting:

- Need standardization and consistency along the coast, including from a scientific perspective.
- Especially important to have this definition with the narrow slot limit and close any loopholes.

3 AP members on the webinar also support <u>Option B. standard definition of total length but prefer fanning the tail,</u> instead of pinching the tail, noting:

- It is unclear how hard to pinch the tail; concern pinching too hard would injure the fish
- Fanning the tail is more of a natural position for the fish.

General agreement that law enforcement should go through training on how to measure a fish.

#### Section 3.2: Commercial Tagging Requirements: Point of Tagging

This topic was discussed on the October 16<sup>th</sup> AP webinar.

3 AP members on the webinar support <u>Option A. Status Quo states choose the point of tagging</u> noting:

- There will always be some level of illegal harvest no matter what the tagging program is.
- Each state should figure out what works best for their fishery.
- In Rhode Island, the season is very short (9 days) so point of harvest tagging does not seem appropriate for this fishery and would be challenging to get tags to individuals.
- In Massachusetts, it is unclear how tags would be distributed to individual fishermen and if harvesters need more tags throughout the season, how would that process work.
- Concern about how Massachusetts would reduce the number of harvesters eligible for tags (currently there are 4,500 commercial endorsements and the state has indicated capacity for about 450 harvesters to receive tags for tagging at point of harvest or point of landing).
- Safety concerns if required to tag immediately would also apply to the hook-and-line fishery. Many people are often fishing at night with a lot of boat traffic at that time and potentially fishing the rips. There would need to be some leeway allowing some time after harvest before tagging is required.

3 AP members on the webinar support Option B. point of harvest tagging noting:

- Illegal commercial activity is occurring and point of harvest would be the best option and would help law-abiding harvesters.
- Low-hanging fruit to require everyone to tag fish point of harvest.
- Definition could be specific like "tag prior to resetting", i.e., if fishing a net, fish the net, get to a safer location to tag the fish, then reset the net.

- Acknowledge that Massachusetts has a lot of challenges to switch to point of harvest or point of landing.
- Acknowledge states with point of sale programs would have to change their quota monitoring from dealer-based reporting to tracking harvester reports instead. Can look to other fisheries/species as examples.

# 4 AP members on the webinar support a combination option with <u>point of harvest tagging for hook-and-line and point of landing for other gears</u> noting:

- Safety concerns with point of harvest tagging for gears like gill nets and pound nets if a harvester is trying to tag fish coming out of the net in rough conditions.
- There is no reason why hook-and-line fisheries cannot tag right away upon harvest; it would be difficult to keep track of fish coming in otherwise.
- Tagging before the dealer would help limit illegal activity.
- Given the limited number of enforcement officers, all fish should be tagged as soon as possible and easily identifiable for enforcement.
- Concerns about the Massachusetts commercial fishery harvesting large fish and how easy it is to get a commercial permit.
- New Jersey's recreational bonus program requires tagging immediately and that system has been working well.

#### Section 3.3: Maryland Chesapeake Bay Recreational Season Baseline

This topic was discussed on the October 9<sup>th</sup> AP webinar.

#### 7 AP members on the webinar support Option A. Status Quo season baseline noting:

- Concern about allowing catch-and-release fishing on spawning females in the spring.
- Concern about making this type of state-specific change during a rebuilding plan.
- Concern about the calculations and assumptions and associated data uncertainty, primarily the inability to predict changes in effort.
- Concern from MD AP member about the season in general and the original summer notargeting closure being in place to allow 2-fish for charter, but not getting those summer days back when charter was reduced to 1-fish.
- 1 AP member noted that if the Board were to allow the new baseline, then the 10% uncertainty buffer in Option C should be applied.

#### Section 3.4: Reduction in Fishery Removals to Support Stock Rebuilding

This topic was discussed on the October 9<sup>th</sup> AP webinar.

#### 9 AP members on the webinar support Option A. Status Quo no reduction noting:

- A reduction is not going to address the real issues of environmental conditions, low recruitment, predation concerns, etc.
- Any kind of season closure would devastate the for-hire industry and industry conditions
  are already hard enough now under current regulations, including the narrow slot and
  the Chesapeake Bay reduction to a 1-fish bag limit for charter.

- The negative economic impacts are far greater than the potential reward.
- The for-hire and commercial industries are already disappearing. Both sectors have taken multiple cuts already, and effort has already declined due to current regulations like the narrow slot.
- Projections are based on MRIP data with assumed higher fishing mortality in 2025, but 2025 has not been a good year with the lack of available menhaden in NJ.
- Recommend waiting until the 2027 stock assessment is complete to consider management changes.
- Fishermen have been promised results for a long time from all the previous reductions, but the management system is not working.
- The commercial quotas are already so low and businesses will no longer be profitable with future cuts.
- Concern about the accuracy of MRIP data. For-hire and commercial have more accurate reporting while private anglers only have MRIP estimates.
- Questioned whether the spawning stock biomass target is attainable; it was only achieved for a few years in the early 2000s.
- In the early 2000s when the stock was at the target, the fishery and conditions were
  very different than current conditions. Since the early 2000s, striped bass catch-andrelease has increased, temperature has increased, other environmental conditions have
  changed, the male:female sex ratios have changed, and specific competition for
  available forage species has changed.

### 5 AP members on the webinar support Option B. 12% reduction for both sectors noting:

- Striped bass are the lynchpin of the economy and not taking a reduction now would lose valuable time to reach the target; want to ensure there is a fishery in the future.
- The fishery is in trouble and rebuilding needs to stay on track. If action is not taken now, there will be a bigger reduction in the future.
- Spawning success and recruitment were poor for six consecutive years and there is concern about the stock's ability to recover; the priority is making sure spawning females are protected to have a chance to spawn.
- This draft addendum addresses effort control, which is the current necessary reality with a shrinking stock and a fishery that needs to shrink alongside it as fish become less available.
- The Board cannot control environmental factors, only fishing mortality.
- There is always going to be variability in data, and data uncertainty goes both ways (e.g., could be overestimating fishery removals OR underestimating fishery removals).
- Surfcasters often see the first signs of decline, and that segment of an AP member's RI business has declined.
- This summer's fishery in New England was not what it should have been with no small fish around.
- Regarding the draft addendum document itself, one AP member noted concern that the
  figure showing spawning stock biomass in pounds and recruitment in number of fish
  (Figure 1 from the draft addendum) is misleading with the mismatched units (pounds vs.

number of fish). In pounds, spawning stock biomass is increasing as larger fish are growing heavier but that does not necessarily represent the same growth in number of fish. Spawning stock biomass is numbers will be facing the challenge of incoming weak year-classes and that is not apparent in the figure.

2 AP members noted on the webinar the commercial sector should not take a reduction noting:

- There have already been multiple cuts to commercial quota in recent years.
- Commercial fishery is strictly regulated and held accountable and does not exceed its quota.
- 1 of these AP members does support a reduction for the recreational sector.

1 AP member noted industry differences regarding the views of tackle manufacturers based on what products they sell and what fishermen their business is focused on. Surf/light tackle tend to support a reduction, while others do not support a reduction.

2 AP members on the webinar noted opposition to any mode split options (opposed to O2/CB2 options).

#### Type of Season Closure

5 AP members on the webinar <u>support no-harvest closures</u> noting:

- Opposed to no-targeting closures due to enforceability concerns, including the Law Enforcement's position that no-targeting closures are the least enforceable measure.
- No-harvest closures would minimize some economic impact by still allowing catch-andrelease, as the largest economic driver is citizen anglers going fishing and supporting associated businesses.
- Concern about the calculations and assumptions for no-targeting closures, and concern that the estimated no-targeting reductions would not be realized.

1 AP member on the webinar <u>supports a no-targeting closure</u> if there are season closures noting:

- While it would be difficult to enforce, most fishermen would follow the regulations. The EEZ has been closed to targeting for years.
- No-targeting closure would effect all recreational anglers, including catch-and-release.

#### **Season Closure Considerations**

1 AP member noted these large regional closures do not seem fair or equitable to all states.

1 AP member noted that seasons should be continuous with a start and end date. Short closures in the middle of the season will not be effective.

1 AP member supports grouping Rhode Island in the Mid-Atlantic region since the fishery is more similar to Connecticut and New Jersey than the New England States.

- 1 AP member noted the decision about the Rhode Island regional grouping is complex. From a MA perspective example, the MA fishery timing differs by up to six weeks between the northern and southern end of the state.
- 1 AP member recommends that any MA closure protects the spring schoolie fish.
- 1 AP member noted that if there is a striped bass closure in March or April, there are no other species to fish for in NJ.
- 1 AP member noted that any closure in the summer would devastate the MA for-hire fleet.

#### Other Topics

Several AP members noted the importance of angler education on proper release and handling techniques. There is a big need for this and there is good educational content available that could be shared among states. One AP member noted that education on setting fish down in a boat when trying to remove a hook should be included (e.g., setting the fish down on certain surfaces could injure the fish).

A few AP members noted concern about blue catfish predation on striped bass in the Chesapeake Bay and recommend supporting the Bay jurisdictions' efforts to promote the harvest of blue catfish.

- 1 AP member recommends re-establishing a hatchery stocking program. One benefit could be more males on the spawning grounds.
- 1 AP member expressed concern about public hearing comments regarding reducing menhaden harvest. The AP member noted the importance of menhaden as bait for other fisheries (e.g., blue crab fishery) and the idea of reducing other fisheries for the sake of striped bass defeats the purpose of mitigating socioeconomic impacts.

#### AP Member Comments Submitted Via Email

Enclosed are comments submitted via email from four AP members who were not able to attend the meeting and/or who provided additional comments after the meeting.

From: Dennis Fleming
To: Emilie Franke

Subject: [External] [New] Striped Bass AP

Date: Thursday, October 16, 2025 4:58:42 PM

This email serves as a formal response on my behalf regarding the proposed 12% reduction.

I wholeheartedly support the reduction as it maximizes the potential for a recovered fishery by 2029. My position is a "resource first" decision.

I was listening by telephone on the last discussion and will be doing so again today.

Keep up the good work and lastly,

# I ADMIRE YOUR PATIENCE AND DIPLOMACY WITH THESE AP DISCUSSIONS.

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 From:
 Toby Lapinski

 To:
 Comments

 Cc:
 Emilie Franke

**Subject:** [External] Striped Bass Draft Addendum III Comments

**Date:** Friday, October 3, 2025 3:35:30 PM

I would like to submit the following on Draft Addendum III to Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

My name is Toby Lapinski. I am a recreational angler from the State of Connecticut. I have been an active participant in the recreational striped bass fishery for more than 40 years. I hold one of the ASMFC's Advisory Panel seats for the State of Connecticut. I am a member of the American Sportfishing Association where I sit on several committees including Government Affairs, Saltwater East, and Freshwater. I previously held the position of Managing Editor of the New England edition of *The Fisherman Magazine*. I currently hold the position of Editor in Chief at *Fishing Tackle Retailer Magazine* and *The Fishing Wire*. I am co-host of *The Surfcast Podcast*, which primarily discusses topics of fishing for striped bass and receives more than 5,000 downloads per week. I have authored many hundreds of articles on fishing for striped bass, both from shore and by boat, for more than 25 years as a freelance writer for a variety of both regional and national publications. I have been featured as a guest speaker at a variety of club meetings, seminars, events, and regional fishing shows from Massachusetts through New Jersey.

While I commend the ASMFC for offering the Survey Monkey option for submitting comments, and I would like to see this option continue for all future public comment sessions, please add an option to provide comments above and beyond each line item. As the survey was set up, respondents could only make a selection or provide a comment on the listed items, not both as I have done below.

Thank you.

# 3.1 Method to Measure Total Length of a Striped Bass Option B. Mandatory Elements for Total Length Definition

**NOTES:** There should be consistency across all States on this matter. If an angler cannot accurately measure a fish to ensure compliance for harvest based on how and where they are fishing, as has been a reason for opposition to the methods for measurement as set forth in Option B, then they should not consider harvesting said fish.

# 3.2 Commercial Tagging: Point of Tagging Option B. Point of Harvest

**NOTES:** As shown in Table 6 of the Draft Addendum, 3 States require tagging at point of sale, 4 at point of harvest, and 1 at both. This shows that there is no reason a State's commercial fishermen cannot change to a different method despite those opposing change

citing supposed problems in the other method. Theoretically, point of harvest tagging should reduce poaching which is why I chose this method. Unfortunately, it has been proven repeatedly that an angler choosing to circumvent the law will find a way to do so regardless of the law. Despite this, I feel that consistency across all States should be achieved on this matter, and with most States currently tagging at point of harvest, this option makes the most sense.

#### 3.3 Maryland Chesapeake Bay Recreational Season Baseline

Option C. New Chesapeake Bay Recreational Season Baseline Plus 10% Uncertainty Buffer

**NOTES:** No additional comments.

# 3.4 Reduction in Fishery Removals to Support Stock Rebuilding

Option B01: Even Sector Reductions: Commercial -12% and Recreational -12%

No position taken as to the CB fishery.

**NOTES:** Reductions should be spread evenly across all user groups. There should not be a mode split for striped bass with an exception made for the for-hire industry as there is currently no mandatory reporting and catch data being collected for all for-hire vessels. While there is reporting currently being done by Federally permitted vessels, this is not required for striped bass by those captains who do not operate in Federal waters. If the for-hire sector wishes to seek a mode split, I would only be in favor of this action under the condition that there was a strict quota enacted with mandatory reporting and sufficient penalties for failure to comply as is the case in the commercial fishery.

# 3.4 Reduction in Fishery Removals to Support Stock Rebuilding Ocean Season Closures

I support a no-harvest (catch-and-release-only) closure.

**NOTES:** While a no-harvest closure comes with a longer closed season than that of a notarget closure, it has been stated by the law enforcement committee of the ASMFC that such closures are generally unenforceable. Further, as was my comment in the Commercial Tagging item, an angler so choosing to circumvent the law will find a way to do so regardless of the law meaning that some anglers will continue to target striped bass but claim their intent was to target a different species such as bluefish, black sea bass, etc. A perfect example of this occurs in the EEZ where targeting striped bass is illegal yet there are countless numbers of boats targeting striped bass with little fear of recourse.

# 3.4 Reduction in Fishery Removals to Support Stock Rebuilding Closures for 12% Reduction for All Modes Region Splits

No selection for notes below

**NOTES:** The option to make the ocean fishery regional split demarcation line the State of

Rhode Island is a poor choice in as much as determining equitable burden of reduction. The only grouping options presented are 1) ME – MA/ RI – NC and 2) ME – RI/CT – NC. It was stated at the Connecticut public hearing on September 15 in Old Lyme that these two options were selected because NY needed to have the same season as NJ, and NY had to have the same season as CT, both because of adjoining waters. However, when RI becomes the line of demarcation, it too has common waters with MA, CT, and NY so this rationale quickly becomes nullified as there is no viable way for adjoining States not to share waters with another State that received different closure dates. Further, by grouping States from NJ south with any New England States, with each wave closure option, the burden of reduction falls squarely on one group of States while the others within said grouping experience very little burden. Based on the real-world level of angling pressure, I feel that a far better demarcation line would have been the Hudson River making the northern group of ME – NY and the southern group of NJ – NC. While it is not perfect, and there would remain some level of higher burden on some States as opposed to others, this regional breakdown reflects a far more equitable option.

GENERAL COMMENTS: I have been extremely conflicted with this current round of public hearings and comments for Draft Addendum III, specifically relating to 3.4 Reduction in Fishery Removals to Support Stock Rebuilding. While I do not oppose taking a cautionary approach to management in response to and based on accurate and reliable science and data, the proposed management options fail to address one of the largest problems facing striped bass at this time, recruitment. While in theory more adult striped bass should produce an equally elevated level of juvenile fish, this has shown not to be the case. Further, in years when the total striped bass population was extremely low, we have seen extremely high levels of recruitment and vice versa. By exclusively addressing harvest and putting all management effort into how many fish are left swimming in the ocean, the ASMFC is focused on the wrong problem. Until energy is put into figuring out why the striped bass is not producing robust year classes, year after year, any effort to protect the remaining adult striped bass will eventually be nullified.

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#### Dear Emilie,

Thank you for all your work in organizing the discussions around this tenuous issue. I took the opportunity to make a comment during last night's meeting so that it was documented during the meeting. There was a lot of great discussion from the members. I wanted to add a few more comments to clarify my position.

Just to give quick context, I am a retail tackle store owner who also owns a separate for-hire business. I pride myself on representing both the recreational boat/shore angler as well as the for-hire captains and their customers. I am the third generation in the business which began as a charter business, moved to a tackle shop (out of a van) and on to what it is now. We operate two businesses with a national presence as an omnichannel retailer and a multi-boat charter operation. I became active in fisheries management when I was 20 and I have continued since. I was old enough to be part of the Striped Bass moratorium, but young enough to take advantage of great years of future bass fishing.

After digesting last night's meeting, certain perspectives became clear. The goal of the AP, I believe, is to create diversity in user groups, geographics and levels of conservation. It seemed, through the comments, that this has been achieved. What resonated with me was that members from user groups who rely on an over abundance of striped bass, those who mainly catch and release regardless of stock health, and those at the outskirts of the bass population density all supported a reduction. The majority of the stakeholders who rely on Striped Bass to drive the "average angler" were in favor of the status quo. This would echo the same sentiment from the public hearings. There were a majority of anglers who wanted to see a status quo. In many meetings there were anglers passionate about conservation, who made compelling arguments to protect the SSB. They were passionate, but still a minority.

I was concerned, as I listened to some members of the panel make their arguments, that they were under the assumption that the board's directive is to save the Striped Bass. We are dealing with a species that has its own path regardless of human interaction. Species will increase and decline, and also become extinct if they can't adapt to changes in the environment. Unfortunately, human interaction, both direct and indirect, has had an effect on the Striped Bass population. It is the job of the ASMFC and Mid Atlantic Council to be management boards. It is their job to MANAGE the striped bass stock in order to give the greatest access, while balancing the health of the SSB with the socio economic impact of reducing mortality. We are managing, not saving!

It has become clear over the past 6 years that just because a target is set and we continue to manage with the expectation of reaching that target, it may not be attainable. Even the most conservative on the panel admit that we are managing the SSB with very little to show for it. We are producing baby striped bass but we can't get them to grow up! It is time that we actually manage by signalling the alarm that pushes NOAA to look outside the traditional management measures. It is time to look at ECOSYSTEM MANAGEMENT which gives managers and scientists options outside the narrow confines of one species management.

If the board proceeds down the path of continued reductions without advocating for measures outside their current tool box, they are not managing for the future. We are in a changing world! Using 1995 baselines and antiquated techniques will not work. In 1995, we didn't have cell phones, navionics, spot lock, or braided line. We need to manage for the environment that Striped Bass live in now.

The current path of management is not species or socio-economicly responsible and needs to be halted. We need to stay with Status Quo for striped bass, while better research and alternatives are presented. To keep reducing by attacking effort and accessibility is giving false hope to a problem that won't be fixed by reductions. Contrary to the beliefs of many, we haven't been "kicking the can down the road", we have been reducing and reducing to no avail.

On a quick side note, throughout my fisheries board career I have been told that a fully rebuilt robust fishery needs more restrictive regulation. (I didn't understand until it was explained) If the population is strong, managers should be working to reduce mortality, because any effort is going to lead to increased mortality. So many analogies could be used, but if you have 10 people racing for a sandwich and there are 20 sandwiches each person will get one and some will end up with more than one, but if there are only 5 then some people aren't going to get any. Managers should have reacted quicker when we had 2 fish at 28", but they didn't. The current population indicates we are at a stage of "5 sandwiches" and restrictive regulations. There is no reason to continue restricting effort at this point. The population is restricting harvest and mortality on its own. We are in a waiting period to see if we can do a better job managing a revitalized population in the future.

In closing, I would like to say that continued reductions and the thought of a no-targeting closure would cause my business and many others gross economic pain. Mike Pirri from the CT Charter boat association echoed the same. A 12% reduction translates to a 2-3 month closure during at most, a 5 month season. The option to transition our customers to other fisheries is fading away. I sit on the AP for Fluke,Scup and Black Sea Bass as well as this AP. The same issues are echoed there giving more reasons to support inter-board coordination and ecosystem management. Stop this methodology of following a non-working management path and begin working on other alternatives that will actually add more young of the year.

October 20, 2025

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

Dear Emilie Franke,

#### RE: My input to AP discussion of Draft Addendum III to the Atlantic Striped Bass FMP

I was unable to change my schedule and attend the impromptu second meeting of the ASMFC SB AP. Last week's meeting was very frustrating as I feel two things caused the AP to not completed our work for the meeting.

The time allotted for the meeting was unrealistic. This is a pattern and quite frankly it tells me that ASMFC is just checking a box and is not actually interested in letting a group of experienced AP members have a discussion that could provide the board valuable information. Our meetings are always too short, and it only takes one or two diversions to cause a rushed agenda and hinder our work.

Secondly, I would like to humbly encourage the staff & chairperson to administer the meeting by interrupting AP members that stray from the topic. Yes, all AP members should have an opportunity to bring up new topics/idea but that is appropriate for the end of the meeting.

Moving on, please accept the following comments and incorporate them into the AP report:

# 3.4 Reductions in fishery Removals to Support Stock Rebuilding

I feel the addendum is missing what I believe would be the best option(s) to sustainably manage the SB fishery during this time of environmentally driven recruitment failure.

I prefer regional open seasons with data informed opening and closing dates. The rest of the year would be no targeting closures. I feel this would be best for many reasons including for the fish, compliance, enforcement and monitoring. Unfortunately, I don't see the options that get us there nor do I feel that path forward would be possible with this management board thus my comments will focus on what I feel is possible to be adopted.

I support Option 3.4 which requires a 12% reduction of removals to maintain the SSB Rebuilding Plan.

#### I support reductions taken evenly by both the Commercial and Recreational portions of the fishery.

I acknowledge there was a time the commercial fishery had taken reductions that were caused by the recreational fishery however that imbalance was corrected in prior management actions.

The recruitment failure driving this addendum was not caused by any sub sector of the fishery and appears to be a function of environmental changes to the producer areas. It is for this reason all participants should as much as possible, share the impacts of the reductions evenly.

#### I do NOT Support any type of private/for hire mode split.

Anglers on for hire boats should have no right to access a shared natural resource more or less than any other angler.

If the ASMFC chooses to go down the road of mode splits, basic fisheries management philosophy teaches us that mode splits should begin with (historical) allocation and mode split management actions should include all elements in a fishery management plan.

I reject the claim that the for-hire industry will absorb more impact than other sub sectors of the fishery. All participants in the fishery will be impacted.

The issues faced by the fishery have been known for at least all six years of the current rebuilding plan and businesses that rely on striped bass have had plenty of time to adjust their business model. It is not the responsibility of ASMFC to prop up a business that refused to adjust to predicted fishery conditions while others have made the changes needed to maintain profitability. This addendum was expected and predicted.

## I support No Harvest Closures.

The fishery has come to the point that each action moving forward will be picking winners and losers. I feel this is the point in management where socio-economic data is most important to consider. I acknowledge that choosing no harvest closures prioritizes catch & release striped bass fishing over catch & harvest striped bass fishing. I feel the catch & release portion of the fishery is by far the dominant factor as to why the striped bass fishery is the most popular fishery on the east coast and has the largest socio economic and financial impact both the state and national economy of all the East Coast recreational fisheries on

I feel no harvest closures lessens the impact of the reductions on the largest number of participants in the fishery including private anglers, for-hire operations, local tackle shops, tackle manufacturers and lessens the financial impact from ex-vessel striped bass fishing driven tourism.

### I have no preference and will NOT comment on regional closures.

I have commented on multiple prior occasions that I prefer a state-by-state season with an opening date and a closing date that is based on recent data. I feel the overly complicated tables and short in-season, no harvest closures are likely to fail for many reasons. I feel a classic structured season, even in mixed target fisheries are easily digested by the public and are proven to be successful and effective management tools.

I was appointed to represent the recreational anglers of Massachusetts. Based on these tables, different areas of Massachusetts will be affected in very different ways depending on which in season closure is chosen. To choose one of these options requires a regional discussion that includes NH & RI and without that discussion I don't feel I have enough info to choose an option.

#### Section 2.0 - Overview

Although the Spawning Stock Biomass is rebuilding, that growth appears to be driven by weight due to the 2011 & 2015 year classes getting older and larger as opposed to growth from numbers of fish

increasing the size of the SSB. I doubt the current total focus of management on spawning stock rebuilding will prevent the predicted significant decline of the fishery.

In addition, I speculate that "if" the reason eggs are not surviving is a deficiency of nutrients in the spawning areas due to temperature changes and reduced water flow, then it is possible adding additional eggs to compete for a reduced amount of nutrients could have a negative impact on spawning success. Additional conservation is the only path forward as managers and increased research work to find a long-term sustainable future for the fishery.

I suggest that the striped bass fishery is in an emergency and a significant portion of ASMFC research resources be immediately redirected to explore alternative actions for addressing the fishery's predicted imminent decline.

# 3.1 Method to measure total length of a striped bass

I support Option B which further defines and standardizes how to measure a striped bass.

I feel there needs to be a coast wide standard.

I am personally aware that in MA, anglers are spreading tails to reduce length of an over slot sized fish in order to make what should be a keeper slot sized fish appear as a slot sized fish. This behavior defeats the management priority of protecting the tow remaining strong year classes.

I agree and support the comments of the MA Environmental Police on this issue.

# 3.2 Commercial Tagging

#### I support Option 3.2 which requires commercial tagging happen at the point of harvest.

I reject the claim that this is unsafe. Commercial fish must be stored properly and tagging a fish will only add a couple minutes to that process. Tagging is a part of why commercial fishing is a business and not a recreational activity.

I support this proposal because it will prevent the existing practice (in MA) of individuals buying the ability to harvest larger commercial sized fish for personal/recreational use.

I reject the argument that this is too complicated to manage because it is accomplished in many states.

I support this proposal because it will eliminate some commercial high grading which adds to commercial release mortality.

I reject the claim that this process will be overly costly. States should consider management expenses when determining the cost of a commercial fishing permit or endorsement.

#### 3.3 Maryland Chesapeake Bay Recreational Season Baseline

I support Option 3.3 which maintains the status quo recreational seasons for Maryland.

I am concerned about the constant manipulation of draft regulations by the state of Maryland. Maryland repeatedly proposes alternative management that adds additional uncertainty into the statistical analysis used to determine recreational catch in Maryland.

Recent history informs us that on more than one occasion, this type of alternative proposal has failed to achieve conservation goals when scrutinized after the fact.

This proposal violates the spirit of the recent decision to prohibit conservation equivalency proposals during rebuilding. I feel no alternative proposals should be made at this critical time in the rebuilding plan. This issue is better suited for the next amendment and only after SSB is rebuilt.

Thank You for the opportunity to complete our task for the AP meeting.

Sincerely; Patrick Paquette